



Commonwealth of Massachusetts
EXECUTIVE OFFICE OF HOUSING &
LIVABLE COMMUNITIES

Maura T. Healey, Governor ♦ Kimberly Driscoll, Lieutenant Governor ♦ Edward M. Augustus, Jr., Secretary

**2024 Report on Data Collection for Government
Assisted Housing in Massachusetts**

I. Executive Summary

This report to the legislature is submitted by the Executive Office of Housing and Livable Communities (“EOHLC,” formerly known as the Department of Housing and Community Development (“DHCD”)) pursuant to Chapter 334 of the Acts of 2006 (“the Act”). Pursuant to the Act, EOHLC must gather, compile, and report data in order to provide current, accurate, and detailed information on the number, location, and residents of assisted housing units and recipients of state or federal rental assistance. EOHLC regulations implementing the Act are found at 760 CMR 61.00.

Data reporting methods and systems, including a description of data collection efforts, as well as data collection results, are discussed in this report by housing type, i.e.: private rental housing with state administered public subsidy; private ownership housing with state administered public subsidy; state aided-public housing, state rental assistance, state administered federal rental assistance; state administered Community Development Block Grant funded housing; Continuum of Care (“CoC”) Balance of State program rental assistance/transitional housing/supportive housing; and federally administered public housing and rental assistance data as reported through the U.S. Department of Housing and Urban Development’s (“HUD”) information system.

Additionally, an excerpt from EOHLC’s 2019 Analysis of Impediments to Fair Housing Choice (“AI”) is included in the Appendix to this report as an example of how detailed data analysis, including data mapping, can be produced with additional resources and incorporated into a discussion of state affirmative fair housing goals. (Any references to “DHCD” in the AI now pertain to EOHLC.)

The U.S. Department of Housing and Urban Development (“HUD”) imposes an obligation to affirmatively further fair housing on recipients of certain HUD funding, which includes conducting an AI or other assessment of fair housing.¹ Since the publication of EOHLC’s 2013 AI, HUD promulgated its Affirmatively Furthering Fair Housing (“AFFH”) Final Rule, which HUD later rescinded in 2020 and then partially restored in 2021.² The AFFH rule as originally published required, *inter alia*, program participants to submit an Assessment of Fair Housing (“AFH”) in place of an AI. As HUD had yet to finalize an AFH Assessment Tool for states and has generally instructed program participants to comply with AI (pre-AFH) requirements, EOHLC updated its AI with assistance from a consultant, hired in 2018, and input from an AI Advisory Council in addition to other stakeholders and members of the public.

EOHLC’s AI, which was published in November of 2019, incorporated key fair housing considerations (which are also AFH considerations) as it did in 2013, including data relating to

¹ The AI is a document required of jurisdictions, such as the Commonwealth of Massachusetts through EOHLC, that are obligated to affirmatively further fair housing as a condition of receiving federal housing and urban development funds. An important component of the AI is the evaluation of public and private conditions that affect housing choices for persons who are protected under fair housing laws, including on the basis of race, color, religion, sex, national origin, familial status, and disability.

² 80 FR 42272 (July 16, 2015); 86 FR 30779; U.S. Department of Housing and Urban Development Interim Final Rule, “Restoring Affirmatively Furthering Fair Housing Definitions and Certifications” (June 10, 2021); 24 C.F.R. § 5.150 *et seq.*

patterns of integration and segregation, racially and ethnically concentrated areas of poverty, disparities in access to opportunity, disproportionate housing needs, and publicly supported housing. In addition to data that HUD makes available for various federal publicly supported programs, EOHLC's Chapter 334 "Data Collection" data was a primary source for various state-administered subsidy programs.

Key summary Data Collection data discussed in the Appendix includes the following tables and maps:

- Table 6.10 (summary of key data analyzed)
- Table 6.11 (summary of 2017 unit and resident characteristics in covered rental housing)
- Table 6.13 (distribution of renter households assisted with federal and state housing subsidies by race/ethnicity)
- Tables 6.16, 6.17 (private assisted rental housing, Section 8 voucher utilization by race, in areas of concentrated poverty)
- Table 6.18 (units with 3 or more bedrooms as a % of municipalities' public and private assisted rental housing)
- Map 6.1 (private assisted rental housing against poverty level of Census tract)
- Map 6.2 (state-aided public housing against poverty level of Census tract)
- Map 6.3 (tenant-based vouchers against poverty level of Census Tract (includes MRVP, AHVP, and federal Section 8 vouchers administered through the state))
- Maps 6.4-6.7 (voucher utilization against poverty level of Census tract by race/ethnicity)

EOHLC plans to begin an update to the AI, or alternative assessment as may be required by HUD, in 2025 through the Office of Fair Housing, which was created through the Affordable Homes Act (Chapter 150 of the Acts of 2024).

II. Background

This report to the legislature is submitted by EOHLC pursuant to Chapter 334 of the Acts of 2006 ("the Act").

Pursuant to the Act, EOHLC must gather, compile, and report data in order to provide current, accurate, and detailed information on the number, location, and residents of assisted housing units and recipients of state or federal rental assistance. As stated in previous reports, EOHLC will provide general statistical information resulting from data collection to interested persons (such as housing advocates and researchers) in a manner consistent with all applicable privacy laws.

As entities that own and manage assisted housing such as property owners, managers, regional non-profit agencies, and public housing authorities have a diverse range of staffing and technological support capabilities to report the necessary data, EOHLC continues to face challenges in obtaining uniform and complete reporting, particularly on an annual basis. However, significant progress has been made with respect to data analysis as well as

incorporation of data into fair housing analysis and planning documents such as the AI as described above and excerpted in the Appendix below.

III. Regulatory Implementation

EOHLC (then DHCD) filed emergency data collection regulations effective November 16, 2007. A public hearing was held on January 22, 2008. The final regulations, Data Collection for Government Assisted Housing in Massachusetts, 760 CMR 61.00 *et seq.*, became effective February 8, 2008. Data reporting requirements have also been incorporated into regulatory documents of state subsidy programs.

IV. Data Reporting Methods and Systems

Provided below is a description of the methods through which EOHLC continues to collect data from reporting entities, as well as a discussion of some of the limitations and improvements of such methods. As a general matter, EOHLC has the capacity to import the data it collects into Microsoft Access or SQL database files through which data manipulation can be performed.

A. Web-Based Reporting System for Private Rental Housing with State Administered Public Subsidy (“web-based system”)

The web-based system, accessible at <https://hedhsgdevannualreport.azurewebsites.net/>, was developed to enable online reporting on project and household data by project sponsor/owner organizations or their delegated management organizations on rental projects with public subsidy provided by or administered by EOHLC and/or the state quasi-public agencies MassHousing, Massachusetts Housing Partnership (“MHP”), and MassDevelopment. EOHLC continues to partner with the quasi-public state agencies by collecting data through the web-based system in order to: 1) avoid duplicative reporting burdens on property owner and manager organizations due to the fact that many projects are subsidized by more than one agency; and 2) avoid double-counting of projects and units served by more than one subsidizing agency. Maintaining current information on, as well as tracking reporting responses by, owner and manager organizations continues to pose additional time and staffing constraints for EOHLC and also requires staff time from the quasi-public agencies.

Subsequent to the web-based system becoming operational in 2007, EOHLC has repeatedly notified organizations of its data reporting requirements.³ In 2024, prior to the established annual reporting deadline of September 30, EOHLC sent electronic notices to sponsor/owner organizations (over 1,000) and management organizations (over 230) on August 1, 2024). EOHLC also sent out a reminder electronic notice instructing organizations that had not reported by the deadline or that reported incompletely, to re-submit data reports through the web-based system no later than November 1, 2024. MassHousing also sent out reminders to property managers/site managers. EOHLC informed organizations that their failure to respond to the deadline would be regarded by EOHLC for its data analysis and reporting purposes as a failure to report for the 2024 reporting year.

³ Described in further detail in the User Guide at <https://hedhsgdevannualreport.azurewebsites.net/>.

Similar to previous reporting years, EOHLC instructed reporting organizations to review, prior to submitting or resubmitting data reports for all projects, the “completeness and accuracy check” page in the web-based system to ensure complete reporting. If complete information was unavailable for reporting, organizations were instructed to provide a brief explanation in the “notes” field on the “completeness and accuracy check” page of the web-based system.

The “administrative tool” allows EOHLC and its quasi-public partners’ ability to assess project and reporting organization status and completeness in order to provide technical assistance as the “lead agency” for a particular project. EOHLC assumed responsibility as the “lead agency” for all projects with applicable EOHLC subsidy, regardless of whether the term or amount of the subsidy was less than that of other subsidy provided by the quasi-public agencies. The administrative tool also allows EOHLC and its quasi-public partners to review notes submitted by reporting organizations to determine whether an incomplete report is acceptable.

It is important to note that there are various explanations for why non-reporting may be acceptable to the agencies for some of the projects. For example, as noted in prior reports, several reporting organizations of group home units and other special needs housing have noted that the Department of Developmental Services (“DDS”) or the Department of Mental Health (“DMH”), or DDS/DMH licensed services providers, were the holders of household information.

Additionally, there are instances of rental projects financed by MassHousing without traditional subsidies where specific household information on low-and moderate-income tenants was not known because the tenants were voucher holders and therefore selected through a housing authority. Although EOHLC does collect information from local housing authorities and regional non-profit agencies with respect to state rental assistance and federal rental assistance administered by the state, a method for avoiding such duplication of data would likely require more staff resources and has yet to be developed. Such a method would also not eliminate duplication of units with federal rental assistance not administered through the state.

B. Spreadsheet System for Private Ownership Housing with State Administered Public Subsidy

EOHLC’s primary focus in technological development and planning continues to pertain to rental developments (private developments with state administered public subsidy), which represent the majority of its assisted housing. Data on ownership units, assisted through EOHLC and the quasi-public agencies, is currently submitted to EOHLC via Microsoft Excel spreadsheets. Although the development of a web-based reporting system similar to the web-based system for rental projects may be possible in the future, resources for such development remain limited at this time.

Through Microsoft Excel spreadsheet submissions, project sponsors/reporting organizations were to report on sales and resales during the period of August 1, 2023 through July 31, 2024. Reporting directly by project sponsors continues to occur for MassHousing assisted projects only, as EOHLC staff gather the unit and household information from existing records based on an independent data collection process developed for reporting to HUD.

Reported data on ownership projects continues to be small in comparison to rental projects. This is likely the case because of the few numbers of resales in a given year, and particularly so within the last two years due to the economic climate. Moreover, data on resale units is generally more difficult to obtain due to the discontinued role of the original project sponsors and the reduced involvement of the state funding agency. However, EOHLC received a significant amount of data directly from MassHousing and MHP on recipients of homeowner loan and mortgage products.

C. Data Collection System for State-Aided Public Housing, State Rental Assistance, and Federal Rental Assistance Administered by the State

EOHLC currently requests data from the approximately 230 local housing authorities (LHAs) operating state-aided public housing, the approximately 113 LHAs (not including regional agencies) currently administering state rental assistance (mobile and/or project-based), and the 8 non-profit regional administering agencies (“RAAs”) of state rental assistance (mobile and project-based).

The process of collecting and analyzing data from LHAs was substantially improved in 2018 through implementation of a new system to streamline reporting and enable EOHLC to compile and analyze data more efficiently and effectively. LHAs reported by uploading spreadsheets through the EOHLC-LHA Housing Applications website at <https://hedlhportal.azurewebsites.net/Login.aspx>, a portal through which other types of LHA reports are submitted to EOHLC.

Most recently, EOHLC launched the State Oversight of Housing Assistance (“SOHA”) Data Warehouse, which is intended to centralize tenant/participant level data accessible to EOHLC for state-funded rental assistance (MRVP and AHVP) and state-aided public housing programs (“Chapter 667” (elderly/disabled), “Chapter 705” (family), and “Chapter 200” (family/veterans) housing). Transmission of data into SOHA from other systems utilized by LHAs and RAAs for various reporting currently remains in process. The “Chapter 689/167” (special needs) housing and DMH Rental Subsidy Program (“DMHRSP”) programs are not currently part of SOHA, although DMHRSP may be incorporated into SOHA in the nearer term. As Chapter 689/167 eligibility determination, tenant selection, and rental payments are conducted primarily through DDS and DMH service providers for DDS/DMH clients, EOHLC is exploring certain demographic data that DDS/DMH may provide to EOHLC in the aggregate, subject to the privacy restrictions of those agencies. Currently, DMH is collecting race/ethnicity and certain other household data on 554 DMH clients residing in Chapter 689/167 housing, and DDS is collecting limited data on approximately 853 clients residing in Chapter 689/167 housing. DDS is not currently collecting client race/ethnicity data but has indicated it will be incorporating such data into a new data management system.

For this reporting year, EOHLC provided notice to Local Housing Authorities regarding data reporting on August 3, 2024 (PHN 2024-14). LHAs that had not transitioned their data to SOHA were instructed to continue to report by uploading spreadsheets through the EOHLC-LHA Housing Applications website. The initial deadline for the 2024 mandatory data reporting to EOHLC was September 30, 2024; however, to garner more results from LHAs, EOHLC sent out a second electronic notice requesting reporting to be submitted no later than November 1, 2024.

LHAs were informed that if data reporting was not received by said date, for data analysis and reporting purposes including reporting to the Massachusetts legislature, EOHLC may regard the LHA as having failed to report or having reported incompletely for the 2024 reporting year. A listing of housing authorities that did not report is found in Tables 2 and 4 of this report.

EOHLC continues to run data for its federal rental assistance programs in-house.

D. Community Development Block Grant (“CDBG”) Grant Management System (“GMS”)

EOHLC continues to use GMS for reporting on the CDBG funds it administers to non-entitlement communities for housing units. Such a reporting system provides aggregate resident data (renter and owner occupied) by loans/grants. Data is initially collected at the applicant stage and is generally updated when the project closes out. Data reporting is required contractually and pursuant to HUD regulations.

E. Continuum of Care (“CoC”) Balance of State Program Rental Assistance/Transitional Housing/Supportive Housing

Data is compiled in-house utilizing data from the Homeless Management Information System (“HMIS”) used by EOHLC for the Balance of State CoC.⁴

F. HUD Public Information Center Reporting System

As explained in prior reports, HUD’s Office of Public and Indian Housing (PIH) requires reporting of data on federal rental assistance and on federal public housing through its Public Information Center (“PIC”) reporting system. EOHLC has access to PIC summary resident statistics reports on housing authorities/agencies administering Section 8 or federal public housing in Massachusetts. Although EOHLC does not administer federal public housing nor does it administer the majority of Section 8 allocated in the state, it is able to compile summary statistical information from PIC for reporting to the legislature and other interested persons.

V. **Data Analysis Methods and Efforts**

EOHLC generally has the capacity to import the data information it collects (“Data Collection data”) into Microsoft Access or SQL database files. Through such files, EOHLC can perform data queries to ascertain specific descriptive statistics. For example, EOHLC is able to produce a data table in response to a request for information on the number of racial minority heads of households in state-aided public housing in the city of Boston. EOHLC is also considering new software applications that may be available to better analyze the data it collects.

Subsequent to data compilation, formatting, and querying, EOHLC is able to generate data at various geographic levels, although the level of detail or data that is shared is dependent on privacy considerations. EOHLC continues to advise that it will not release household

⁴ EOHLC manages 1 of the 12 HUD approved Continuums of Care across the Commonwealth and applies for homeless assistance funds annually in what is known as the Balance of State CoC.

characteristic subsidy, or other data at a level that could potentially be associated with individual households. This would include data at certain census tract and community levels given that some smaller census tracts and communities contain little state-assisted housing, and that the data specifically pertains to the actual state-assisted units within the housing.

As noted in prior reports, Census tract level data has been analyzed and then aggregated for public reporting through the assistance of consultants, particularly for purposes of conducting an Analysis of Impediments to Fair Housing Choice (“AI”). EOHLC recently updated its AI utilizing Data Collection, Census, and other data through the assistance of a consultant, who was engaged in the fall of 2018 and the final AI was published in November of 2019. The 2019 AI is available at: <https://www.mass.gov/service-details/analysis-of-impediments-to-fair-housing-choice-ai>. The section of the AI that contains the consultant’s analysis of Data Collection data is also excerpted and included in the Appendix below. As noted above, EOHLC plans to begin an update to the AI (or alternative assessment as may be required by HUD in 2024).

VI. 2024 Data Reporting Results

As stated above, EOHLC has the capacity to perform data queries to ascertain specific descriptive statistics. Provided below is a preliminary summary of data reporting results.

A. Private Rental Housing with State Administered Public Subsidy

Over 91,593 total units were reported through the web-based system during the 2024 reporting period. Units no longer subject to state administered subsidies are not required to be reported on. The 2024 reported units were distributed across approximately 1,358 projects, a decrease in approximately 2 projects and a decrease of approximately 97 units reported the prior year. Amongst these reported projects, EOHLC served as the lead agency for approximately 897 projects (approximately 50,519 units), followed by MassHousing for approximately 391 projects (approximately 38,179 units), MHP for approximately 51 projects (approximately 1,459 units), and MassDevelopment for approximately 19 projects (approximately 1,436 units). See Table 5 for a listing of communities containing housing with state administered public subsidy reported during the 2024 reporting period.

B. Private Ownership Housing with State Administered Public Subsidy

Reporting results for ownership units for the designated 2024 reporting period (August 1, 2023 through July 31, 2024) for sales and resales are attributed by agency as follows:

EOHLC:

Approximately 9 units were reported and collected through EOHLC staff, inclusive of units subsidized through the HOME and Housing Stabilization Fund programs.

MassHousing:

1,301 units with homeownership loans (including units with mortgage insurance funding) were reported directly by MassHousing. With respect to MassHousing's project-based ownership units, EOHLC received data on the Commonwealth Builder program for 42 units that were sold during the reporting period. Additionally, 2 Affordable Housing Trust Fund program (without accompanying EOHLC subsidy) units were reported as sold or re-sold during the data reporting period.

MHP:

161 units assisted through the Soft-Second/ONE Mortgage program were reported.

C. State-Aided Public Housing, State Rental Assistance, and Federal Rental Assistance Administered by the State

State-aided public housing:

Approximately 214 local housing authorities (LHAs) reported approximately 33,890 units for the 2024 reporting period, inclusive (but not duplicative) of LHAs reporting in SOHA. This represents a significant increase in the number of LHAs reporting but a decrease in the number of units reported in comparison to 2023 (188 LHAs reported on approximately 38,402 units).⁵ See Tables 1 and 2 for respective listings of LHAs that did and did not report state-aided public housing units during the 2024 reporting period.

State rental assistance administered by LHAs and Regional Non-Profit Agencies:

Approximately 181 LHAs/RAAs reported approximately 9,484 state rental assistance units for the 2024 reporting period, inclusive (but not duplicative) of LHAs reporting in SOHA. This represents a significant increase in the number of LHAs/RAAs reporting, but a decrease in the number of units reported in comparison to 2023 reporting (92 LHAs/RAAs reported on 10,222 units).⁶ See Tables 3 and 4 for respective listings of LHAs that did and did not report on state rental assistance units during the 2024 reporting period. It should also be noted that some of the under-reported rental assistance unit data is accounted for to the extent the units overlap with the private housing with state administered public subsidy units.

Federal Section 8 rental assistance administered by regional non-profit agencies:

A total of 30,106 units were reported.

D. Community Development Block Grant ("CDBG") Assisted Housing

⁵ SOHA data may be incomplete to the extent that LHAs did not submit new or updated tenant re-examination data through SOHA during the reporting year. Furthermore, Chapter 689/167 data was not collected through LHAs this year as explained in Section IV.C above.

⁶ SOHA data may be incomplete to the extent that LHAs did not submit new or updated participant re-examination data through SOHA during the reporting year. Furthermore, DMHRSP data was not collected through LHAs/RAAs this year as explained in Section IV.C above.

EOHLC CDBG program staff have provided data reports for housing grants during fiscal years 2021 through 2023 for data on a total of 427 beneficiary units.

E. Continuum of Care (“CoC”) Balance of State program Rental Assistance/Transitional housing/Supportive Housing

Data on 580 households was reported.

F. HUD Federal Public Housing and Rental Assistance (from PIC)⁷

Public Housing:

Summary data on a total of 27,563 units is available.

All Voucher Funded Assistance:

Summary data on a total of 66,513 units is available.

Section 8 Moderate Rehabilitation:

Summary data on a total of 875 units is available (additional data on 623 Section 8 Moderate Rehabilitation Single Room Occupancy units).

Project Based Certificates:

Summary data on a total of 6 units is available.

VII. Conclusion

During the 2024 reporting year, EOHLC continued to devote considerable staff resources to technical assistance, data compilation, utilization of data systems, and coordination across state programs. EOHLC continues to strive to improve the quality and quantity of data reporting, including through the new data warehouse, SOHA, which was created to centralize various state-funded rental assistance (MRVP and AHVP) and state-aided public housing tenant/participant level data accessible to EOHLC. EOHLC will also continue to produce data statistics, subject to privacy considerations, in response to requests by interested persons. An excerpt from EOHLC’s (then DHCD’s) 2019 Analysis of Impediments to Fair Housing Choice (“AI”) is included in the Appendix below as an illustration of how Data Collection results may be more fully analyzed with resources for data evaluation and related to state affirmative fair housing goals. EOHLC plans to begin an update to the AI (or alternative assessment required by HUD upon finalization of its Affirmatively Furthering Fair Housing rule) in 2025 through the Office of Fair Housing.

TABLE 1: REPORTING LOCAL HOUSING AUTHORITIES

⁷ May exclude units administered by the regional non-profit agencies and public housing authorities through the HUD Moving to Work Demonstration Program as such units are currently reported separately.

State-Aided Public Housing

Acton Housing Authority	Chicopee Housing Authority
Acushnet Housing Authority	Clinton Housing Authority
Adams Housing Authority	Cohasset Housing Authority
Amesbury Housing Authority	Concord Housing Authority
Amherst Housing Authority	Dalton Housing Authority
Andover Housing Authority	Danvers Housing Authority
Arlington Housing Authority	Dartmouth Housing Authority
Ashland Housing Authority	Dedham Housing Authority
Athol Housing Authority	Dennis Housing Authority
Attleboro Housing Authority	Dighton Housing Authority
Auburn Housing Authority	Dracut Housing Authority
Avon Housing Authority	Dudley Housing Authority
Ayer Housing Authority	Duxbury Housing Authority
Barnstable Housing Authority	East Bridgewater Housing Authority
Barre Housing Authority	East Longmeadow Housing Authority
Bedford Housing Authority	Easthampton Housing Authority
Belchertown Housing Authority	Easton Housing Authority
Bellingham Housing Authority	Essex Housing Authority
Belmont Housing Authority	Everett Housing Authority
Beverly Housing Authority	Fairhaven Housing Authority
Billerica Housing Authority	Fall River Housing Authority
Blackstone Housing Authority	Falmouth Housing Authority
Boston Housing Authority	Fitchburg Housing Authority
Bourne Housing Authority	Foxborough Housing Authority
Braintree Housing Authority	Framingham Housing Authority
Brewster Housing Authority	Franklin County Regional Housing Authority
Bridgewater Housing Authority	Franklin Housing Authority
Brimfield Housing Authority	Gardner Housing Authority
Brockton Housing Authority	Georgetown Housing Authority
Brookline Housing Authority	Gloucester Housing Authority
Burlington Housing Authority	Grafton Housing Authority
Cambridge Housing Authority	Granby Housing Authority
Canton Housing Authority	Greenfield Housing Authority
Carver Housing Authority	Groveland Housing Authority
Charlton Housing Authority	Hadley Housing Authority
Chatham Housing Authority	Halifax Housing Authority
Chelmsford Housing Authority	Hamilton Housing Authority
Chelsea Housing Authority	Harwich Housing Authority
Hatfield Housing Authority	Milford Housing Authority

Haverhill Housing Authority	Millbury Housing Authority
Holbrook Housing Authority	Millis Housing Authority
Holliston Housing Authority	Milton Housing Authority
Holyoke Housing Authority	Monson Housing Authority
Hopedale Housing Authority	Nahant Housing Authority
Hopkinton Housing Authority	Nantucket Housing Authority
Hudson Housing Authority	Natick Housing Authority
Hull Housing Authority	Needham Housing Authority
Ipswich Housing Authority	New Bedford Housing Authority
Kingston Housing Authority	Newburyport Housing Authority
Lancaster Housing Authority	Newton Housing Authority
Lawrence Housing Authority	Norfolk Housing Authority
Lee Housing Authority	North Andover Housing Authority
Leicester Housing Authority	North Attleborough Housing Authority
Lenox Housing Authority	North Brookfield Housing Authority
Leominster Housing Authority	Northampton Housing Authority
Lexington Housing Authority	Northbridge Housing Authority
Littleton Housing Authority	Norton Housing Authority
Lowell Housing Authority	Norwell Housing Authority
Ludlow Housing Authority	Norwood Housing Authority
Lunenburg Housing Authority	Orange Housing Authority
Lynn Housing Authority	Orleans Housing Authority
Malden Housing Authority	Oxford Housing Authority
Manchester Housing Authority	Palmer Housing Authority
Mansfield Housing Authority	Peabody Housing Authority
Marblehead Housing Authority	Pembroke Housing Authority
Marlborough CD Authority	Pittsfield Housing Authority
Marlborough Housing Authority	Plainville Housing Authority
Mashpee Housing Authority	Plymouth Housing Authority
Mattapoissett Housing Authority	Provincetown Housing Authority
Maynard Housing Authority	Quincy Housing Authority
Medfield Housing Authority	Randolph Housing Authority
Medford Housing Authority	Reading Housing Authority
Medway Housing Authority	Revere Housing Authority
Melrose Housing Authority	Rockland Housing Authority
Mendon Housing Authority	Rockport Housing Authority
Merrimac Housing Authority	Rowley Housing Authority
Methuen Housing Authority	Salem Housing Authority
Middleborough Housing Authority	Salisbury Housing Authority
Middleton Housing Authority	Sandwich Housing Authority
Saugus Housing Authority	Williamstown Housing Authority

Scituate Housing Authority	Wilmington Housing Authority
Seekonk Housing Authority	Winchendon Housing Authority
Sharon Housing Authority	Winthrop Housing Authority
Shrewsbury Housing Authority	Woburn Housing Authority
Somerset Housing Authority	Worcester Housing Authority
Somerville Housing Authority	Wrentham Housing Authority
Southborough Housing Authority	
Southbridge Housing Authority	
Southwick Housing Authority	
Spencer Housing Authority	
Springfield Housing Authority	
Sterling Housing Authority	
Stockbridge Housing Authority	
Stoneham Housing Authority	
Stoughton Housing Authority	
Sudbury Housing Authority	
Sutton Housing Authority	
Swampscott Housing Authority	
Swansea Housing Authority	
Taunton Housing Authority	
Templeton Housing Authority	
Tewksbury Housing Authority	
Topsfield Housing Authority	
Tyngsborough Housing Authority	
Upton Housing Authority	
Wakefield Housing Authority	
Walpole Housing Authority	
Waltham Housing Authority	
Ware Housing Authority	
Watertown Housing Authority	
Wayfinders	
Wellesley Housing Authority	
Webster Housing Authority	
Wenham Housing Authority	
West Newbury Housing Authority	
West Springfield Housing Authority	
Westborough Housing Authority	
Westfield Housing Authority	
Weymouth Housing Authority	
Whitman Housing Authority	

TABLE 2: NON-REPORTING LOCAL HOUSING AUTHORITIES

State-Aided Public Housing

Abington Housing Authority
Agawam Housing Authority
Great Barrington Housing Authority
Groton Housing Authority
Hampden Housing Authority
Hanson Housing Authority
Hingham Housing Authority
Holbrook Housing Authority
Holden Housing Authority
Hull Housing Authority
Lee Housing Authority
Lunenburg Housing Authority
Lynnfield Housing Authority
Marshfield Housing Authority
Montague Housing Authority
Natick Housing Authority
North Reading Housing Authority
Northborough Housing Authority
Pepperell Housing Authority
Sterling Housing Authority
Wareham Housing Authority
Warren Housing Authority
West Boylston Housing Authority
Westford Housing Authority

TABLE 3: REPORTING LOCAL HOUSING AUTHORITIES

State Rental Assistance

Acton Housing Authority	Community TeamWork, Inc.
Acushnet Housing Authority	Concord Housing Authority
Adams Housing Authority	Danvers Housing Authority
Amesbury Housing Authority	Dartmouth Housing Authority
Amherst Housing Authority	Dedham Housing Authority
Andover Housing Authority	Dennis Housing Authority
Arlington Housing Authority	Dighton Housing Authority
Ashland Housing Authority	Dracut Housing Authority
Athol Housing Authority	Duxbury Housing Authority
Attleboro Housing Authority	Easton Housing Authority
Avon Housing Authority	Essex Housing Authority
Ayer Housing Authority	Everett Housing Authority
Barnstable Housing Authority	Fairhaven Housing Authority
Barre Housing Authority	Fall River Housing Authority
Bedford Housing Authority	Falmouth Housing Authority
Belchertown Housing Authority	Fitchburg Housing Authority
Bellingham Housing Authority	Foxborough Housing Authority
Belmont Housing Authority	Framingham Housing Authority
Berkshire County Regional Housing Authority	Franklin County Regional Housing Authority
Beverly Housing Authority	Gardner Housing Authority
Blackstone Housing Authority	Georgetown Housing Authority
Boston Housing Authority	Gloucester Housing Authority
Bourne Housing Authority	Grafton Housing Authority
Braintree Housing Authority	Granby Housing Authority
Brewster Housing Authority	Greenfield Housing Authority
Bridgewater Housing Authority	Groveland Housing Authority
Brimfield Housing Authority	HAC Housing Authority
Brockton Housing Authority	Hadley Housing Authority
Brookline Housing Authority	Halifax Housing Authority
Burlington Housing Authority	Harwich Housing Authority
Cambridge Housing Authority	Haverhill Housing Authority
Canton Housing Authority	Holyoke Housing Authority
Carver Housing Authority	Hopkinton Housing Authority
Charlton Housing Authority	Hudson Housing Authority
Chatham Housing Authority	Ipswich Housing Authority
Chelmsford Housing Authority	Kingston Housing Authority
Chelsea Housing Authority	Lawrence Housing Authority
Clinton Housing Authority	Leicester Housing Authority

Leominster Housing Authority	Norwood Housing Authority
Lexington Housing Authority	Orange Housing Authority
Littleton Housing Authority	Orleans Housing Authority
Lowell Housing Authority	Oxford Housing Authority
Lynn Housing Authority	Palmer Housing Authority
Malden Housing Authority	Peabody Housing Authority
Manchester Housing Authority	Pembroke Housing Authority
Mansfield Housing Authority	Pittsfield Housing Authority
Marblehead Housing Authority	Plainville Housing Authority
Marlborough Housing Authority	Plymouth Housing Authority
Mashpee Housing Authority	Provincetown Housing Authority
Mattapoisett Housing Authority	Quincy Housing Authority
Maynard Housing Authority	Randolph Housing Authority
Medfield Housing Authority	RCAP
Medford Housing Authority	Reading Housing Authority
Medway Housing Authority	Revere Housing Authority
Melrose Housing Authority	Rockland Housing Authority
Mendon Housing Authority	Rockport Housing Authority
Methuen Housing Authority	Rowley Housing Authority
Metro Housing Boston	Salem Housing Authority
Middleborough Housing Authority	Sandwich Housing Authority
Middleton Housing Authority	Saugus Housing Authority
Milford Housing Authority	Scituate Housing Authority
Millbury Housing Authority	Sharon Housing Authority
Millis Housing Authority	Shrewsbury Housing Authority
Milton Housing Authority	SMOC
Monson Housing Authority	Somerville Housing Authority
Nantucket Housing Authority	Southborough Housing Authority
Natick Housing Authority	Southbridge Housing Authority
Needham Housing Authority	Spencer Housing Authority
NeighborWorks	Springfield Housing Authority
New Bedford Housing Authority	Stockbridge Housing Authority
Newburyport Housing Authority	Stoneham Housing Authority
Newton Housing Authority	Stoughton Housing Authority
North Andover Housing Authority	Swampscott Housing Authority
North Attleborough Housing Authority	Swansea Housing Authority
North Brookfield Housing Authority	Taunton Housing Authority
Northampton Housing Authority	Templeton Housing Authority
Northbridge Housing Authority	Tewksbury Housing Authority
Norton Housing Authority	Topsfield Housing Authority
Norwell Housing Authority	Tyngsborough Housing Authority

Upton Housing Authority
Wakefield Housing Authority
Walpole Housing Authority
Waltham Housing Authority
Ware Housing Authority
Watertown Housing Authority
Wayfinders
Wellesley Housing Authority
Webster Housing Authority
Wenham Housing Authority
West Newbury Housing Authority
West Springfield Housing Authority
Westborough Housing Authority
Westfield Housing Authority
Weymouth Housing Authority
Whitman Housing Authority
Williamstown Housing Authority
Wilmington Housing Authority
Winchendon Housing Authority
Winthrop Housing Authority
Woburn Housing Authority
Worcester Housing Authority
Wrentham Housing Authority

TABLE 4: NON-REPORTING LOCAL HOUSING AUTHORITIES

State Rental Assistance

East Longmeadow Housing Authority
Holbrook Housing Authority
Marshfield Housing Authority
Natick Housing Authority
Orleans Housing Authority
Pepperell Housing Authority
Wareham Housing Authority
Warren Housing Authority
Webster Housing Authority
Yarmouth Housing Authority

TABLE 5: WEB-BASED DATA COLLECTION RENTAL REPORT
(Private Rental Housing with State Administered Public Subsidy)

Community

Abington	Chelsea
Acton	Chesterfield
Adams	Chicopee
Agawam	Clarksburg
Boston	Clinton
Amesbury	Danvers
Amherst	Dartmouth
Andover	Dedham
Arlington	Dennis
Ashland	Douglas
Athol	Dracut
Attleboro	Duxbury
Auburn	Easthampton
Barnstable	Easton
Bedford	Everett
Belchertown	Fairhaven
Bellingham	Fall River
Belmont	Falmouth
Berlin	Fitchburg
Beverly	Framingham
Beverly	Franklin
Billerica	Gardner
Blackstone	Georgetown
Bolton	Gill
Boston	Gloucester
Bourne	Goshen
Braintree	Grafton
Brewster	Great Barrington
Bridgewater	Greenfield
Brockton	Groton
Brookline	Hadley
Cambridge	Hanover
Canton	Hanson
Carlisle	Harvard
Carver	Harwich
Charlton	Haverhill
Chelmsford	Hingham

Holbrook	New Bedford
Holden	Newburyport
Holliston	Newton
Holyoke	North Adams
Hubbardston	North Andover
Hudson	North Attleborough
Kingston	North Reading
Lakeville	Northampton
Lanesborough	Northborough
Lawrence	Northbridge
Lee	Northampton
Leicester	Norton
Leominster	Norwell
Lexington	Norwood
Lincoln	Oak Bluffs
Littleton	Orange
Longmeadow	Orleans
Lowell	Oxford
Ludlow	Palmer
Lunenburg	Paxton
Lynn	Peabody
Lynnfield	Pittsfield
Malden	Plainville
Manchester	Plymouth
Mansfield	Plympton
Marion	Provincetown
Marlborough	Quincy
Marshfield	Randolph
Mashpee	Raynham
Maynard	Reading
Medfield	Revere
Medford	Rockland
Medway	Rutland
Melrose	Salem
Methuen	Salisbury
Middleborough	Sandwich
Milton	Saugus
Montague	Scituate
Nantucket	Sharon
Natick	Shirley
Needham	Somerset

Somerville	Wenham
South Hadley	West Boylston
Southampton	West Springfield
Southbridge	West Tisbury
Southwick	Westborough
Spencer	Westfield
Springfield	Westford
Stoughton	Westhampton
Stow	Westport
Sturbridge	Westwood
Sudbury	Weymouth
Swampscott	Wilbraham
Swansea	Williamsburg
Taunton	Williamstown
Tewksbury	Winchester
Tisbury	Winthrop
Townsend	Woburn
Truro	Worcester
Tyngsborough	Worthington
Uxbridge	Yarmouth
Vineyard Haven	
Wales	
Walpole	
Waltham	
Ware	
Wareham	
Watertown	
Wayland	
Webster	
Wellesley	
Wellfleet	

APPENDIX: Excerpt from Chapter 6 of EOHLC's (then DHCD's) 2019 Analysis of Impediments to Fair Housing Choice ("AI")

Assisted Housing in Massachusetts: What Counts? Who is Assisted? Where Do They Live?

What counts as subsidized housing, or housing assistance, depends on whom you ask and for what purpose. The state's Subsidized Housing Inventory, HUD's Picture of Subsidized Households and the data collected by the Department of Housing and Community Development (DHCD) under the 2006 Data Collection Act – also called the Massachusetts Government Assisted Housing Database – are the three most comprehensive sources of information on housing assistance in the Commonwealth. Each of the three is used for different purposes, however, and they include different types of housing assistance.⁸

What Counts: The Subsidized Housing Inventory

The Department of Housing and Community Development (DHCD) maintains the state's official tally of units that qualify as affordable housing on its Subsidized Housing Inventory (SHI). These are the units that count toward a municipality's 10 percent goal under Massachusetts General Law Chapter 40B, the State's Comprehensive Permit Statute.⁹ For units to be included on the SHI, the housing development in which they are located must involve some government subsidy, even if just in the form of technical assistance. What constitutes an eligible "subsidy program" has changed over time, as have the production tools, but it is now broadly defined to include – in addition to traditional government subsidy programs – local initiatives that involve only minimal technical support provided by DHCD and developments financed by conventional lenders under the Federal Home Loan Bank of Boston's New England Fund. (Examples of local initiatives include buy-down programs or housing development funded with Community Preservation or municipal Affordable Housing Trust funds, or on town-owned land, or affordable units acquired under inclusionary mandates as long as they meet the income guidelines, satisfy affirmative fair housing marketing and resident selection requirements, are subject to a regulatory agreement, and are monitored by a public agency or non-profit organization.)

The SHI includes rental as well as ownership housing, group homes for certain populations with special needs, and existing homes that are repaired or upgraded using state or federal resources, as long as the unit is subject to both income eligibility and rent or sale prices restrictions. In rental projects, all units

⁸ For the first time this year, HUD provided jurisdictions participating in its Community Development Block Grant (CDBG) programs detailed data on assisted housing resident characteristics and location. This HUD data originates from the same source as the Picture of Subsidized Households, and it includes much, but not all of what has been collected and analyzed locally for this AI, but it is based on earlier (2014 and 2016) datasets. Where the HUD data provides relevant information that would not otherwise be available, it has been incorporated into this AI.

⁹ "An Act Providing for the Construction of Low and Moderate Income Housing in Cities and Towns in Which Local Restrictions Hamper Such Construction" was enacted in 1969 as Sections 20-23 of MGL Chapter 40B, the state's Regional Planning Law, to increase the supply and improve the distribution of housing for low and moderate income families. It allows developers of subsidized housing to apply for all necessary local approvals in the form of a single "comprehensive permit" and to request overrides of local zoning and other restrictions if necessary to make the housing economically feasible. In communities where less than 10 percent of the year-round housing is subsidized and little progress is being made, developers can ask the State Housing Appeals Committee (HAC) to overturn local denials of a comprehensive permit or the imposition of conditions they believe make a project infeasible, absent a finding that the project presents serious health or safety hazards. The statute can be found at <http://www.mass.gov/dhcd/components/SCP/ch40Bsr.htm>. The 40B implementing regulations are found at 760 CMR 56.00 *et seq.*

count, including the market rate ones; in homeownership projects, only the affordable units count. Households subsidized with tenant based rental assistance are not included in the SHI, nor are unsubsidized units purchased by first-time homebuyers with mortgages loans provided under MassHousing programs or the state's Soft Second mortgage program.

More than 262,000 units, representing 9.7 percent of the state's year round housing stock qualified as subsidized housing on the September 14, 2017 SHI. It is estimated that over 85 percent of the units that "count" (some 223,000 units, or 8.3 percent of all year round housing units) are income restricted¹⁰ to households earning no more than 80 percent of the area median income (AMI). ¹¹

An estimated 212,000 of the low income (restricted) units are rental units; over 6,000 are homeowner units. Another 3,000 units qualified when their income-eligible owners, or landlords on behalf of income-eligible tenants, repaired or upgraded their homes with public funds. Beds in group homes serving special populations, under contract or licensed with the state Departments of Mental Health and Developmental Services, account for over 12,000 units.¹² Over 33,000 of the rental units that count on the inventory are market rate units in mixed income developments. These units are not restricted to occupancy by low income households and are not included in the "223,000" estimate. DHCD does not list the number of income-restricted units separately on the SHI.

Massachusetts Data Collection Act

The second major dataset of assisted housing exists as the result of the passage of Chapter 334 of the Acts of 2006 (An Act Relative to Data Collection for Government Assisted Housing in Massachusetts).

Massachusetts is one of just a handful of states with a sizable public housing inventory built and maintained with state funds (approximately 40,000 units). It is also one of the few that provides tenant-based rental assistance, similar to the federal Section 8 Housing Choice Voucher (HCV) program (more than 8,000 vouchers), and other housing production resources. While HUD has long reported demographic and economic data on residents living in federally assisted housing, or receiving federal rental assistance, Massachusetts did not have a mechanism for capturing and reporting such information prior to 2006.

Commonly known as the Data Collection Act, Chapter 334 was intended to help DHCD affirmatively further fair housing by providing the agency with information with which to analyze and evaluate its various housing programs. It requires DHCD to collect, and report annually to the Legislature, the number and location of assisted housing units in Massachusetts and the characteristics of residents receiving assistance. Reporting requirements apply to state funded public housing, voucher programs, and privately owned housing that is supported by state or federal subsidies administered by the state. The implementing regulation requires DHCD to collect information on unit characteristics, including address, tenure, type of building, type of housing (e.g. elder persons, persons with disabilities, family,

¹⁰ For renters, income typically must be certified annually; owners need only income qualify at the time of purchase but are subject to resale restrictions limiting the amount for which they can sell or refinance their home, as well as restrictions on income eligibility for subsequent purchasers.

¹¹ The number of income restricted rental units is not reported on the Subsidized Housing Inventory. The estimates are based on the author's own tracking system. (Owner units are only included on the inventory if they are income restricted.)

¹² Most of these group homes were added to the inventory after 2002 when a DHCD rule change first allowed their inclusion, although many had been serving the same residents for years. For purposes of the SHI, units are counted based on group home capacity (i.e., the number of individuals capable of being served in the group home) as reported by DMH and DDS.

special needs, mixed), number of bedrooms, numbers accessible for mobility impairments and for sensory impairments, and the source and terms of any and all subsidy. It must also collect household data, including income level, race and ethnicity, household type, number of children under age 6 and between age 6-18, and number of households that received *or* requested as accessible unit.¹³ There are five broad categories of assistance for which data are reported:

- State public housing, reported by local housing authorities (LHAs)
- Privately owned/publicly subsidized units, reported by project owners/managers, (These include properties built or rehabbed in the 1960s-1980s under federal programs such as the 221(d)3, 236, Section 8 New Construction/Substantial Rehab programs if they have received additional funding or state or federal low-income housing tax credits (LIHTCs) allocated by DHCD, as well as those built/rehabbed since that time using state or federal resources (including tax credits).
- Tenant based mobile vouchers, reported by administering local housing authorities (LHAs) and regional non-profit agencies. These include all of the state mobile vouchers and those federal mobile vouchers that are administered on behalf of DHCD by regional nonprofits. DHCD's allocation represents about 25 percent of the federal vouchers allotted to Massachusetts.
- Project-based (PB) vouchers, reported by administering LHAs and regional non-profit agencies (These include all of the state PB vouchers and those federal PB vouchers that are administered by regional nonprofits.)
- Homeownership loans (current year only), reported by MassHousing and the Massachusetts Housing Partnership (MHP).

As part of its preparation of this Analysis of Impediments to Fair Housing, DHCD authorized an analysis of the data collected for calendar year 2017. A similar analysis was conducted for the 2013 AI based on 2011 data. The first comprehensive analysis of data reported under the Act was conducted in 2009 by Nancy McArdle, a highly-regarded policy analyst, for the non-profit Action for Regional Equity. The 2008 and 2011 findings have been incorporated into this year's assessment.¹⁴

Data on 167,539 units was collected in 2011, an increase of more than 14 percent over the 146,676 reporting for 2008. In 2017, the number of units reporting increased again to 171,625 (+2.4%) (**Table 6.10**).

Eight regional non-profit organizations that administer federal and state housing vouchers (either project-based or tenant-based (mobile) on behalf of DHCD are subject to the reporting requirements, as are the owners/managers of nearly 1,700 privately-owned subsidized developments. In addition, 211 local housing authorities administer programs that are covered by the Data Collection Act. Fifty-four percent of the reporting housing authorities reported data only on state public housing units they own. The others reported on some combination of units and vouchers, either project-based or mobile (The number of reporting housing authorities may vary from year to year depending on their program participation.). The reporting nonprofits are Berkshire Housing Development Corporation, Community Teamwork Inc., HAP, Housing Assistance Corporation, Metro Housing Boston, RCAP Solutions, South Middlesex Opportunity Council (SMOC), and South Shore Housing Development Corporation.

¹³ The statute is found at <http://www.malegislature.gov/Laws/SessionLaws/Acts/2006/Chapter334>; the implementing regulations are found in Section 760 Chapter 61 of the Code of Massachusetts Regulations (CMR).

¹⁴ Highlights of Ms. McArdle's analysis of the 2008 data were also reported in the 2013 AI.

Table 6.10: Summary of Data Reported Under Chapter 334 of the Acts of 2006 (Data Collection for Government Assisted Housing in MA), 2008-2011-2017

Program Type	Number of Units Reporting		
	2008	2011	2017
Privately-Owned / Publicly Subsidized	81,774	95,189	98,498
State Public Housing	37,541	41,517	39,553
<i>Family</i>	<i>NA</i>	<i>13,921</i>	<i>12,046</i>
<i>Elderly/Disabled</i>	<i>NA</i>	<i>27,322</i>	<i>27,139</i>
<i>Special Needs</i>	<i>NA</i>	<i>274</i>	<i>365</i>
Federal HCVs* (mobile) administered for DHCD by Regional Non-Profits	19,660	21,579	20,780
Federal HCVs* (project-based) administered for DHCD by Regional Non-Profits	478	1,663	1,452
State Project-Based Assistance administered by Local Housing Authorities (LHAs)	1,854	2,317	2,015
State Project-Based Assistance administered by Regional Non-Profits	647	1,157	1,452
State Mobile Assistance administered by LHAs	1,383	1,618	1,863
State Mobile Assistance administered by Regional Non-Profits	987	869	2,997
MassHousing Homeownership**	1,865	1,437	2,708
MHP Soft Second	406	193	307
DHCD Homeownership	81	-	-
TOTAL	146,676	167,539	171,625

Source: DHCD 2008, 2011 and 2017 Housing Data Collection (2008 summaries provided by Nancy McArdle)

Note: Some units are subsidized by more than one program type, resulting in some degree of double counting. This typically occurs when tenants use a housing voucher to rent a home in a privately-owned, publicly subsidized units.

* Section 8 Housing Choice Vouchers

** MassHousing reported an additional 102 home improvement, lead paint abatement and septic repair/replacement loans in 2017, not included in summary

HUD's Picture of Subsidized Households

The final data source reviewed as part of the AI process is the federal Department of Housing and Urban Development's Picture of Subsidized Households (PSH), issued annually. This extensive national dataset – more than five million records are included in the 2017 report – provides characteristics on HUD assisted housing units and households, which can be summarized in a variety of ways (e.g., by geography at the state, local or census tract level, or by program type or administering agency).¹⁵

The 2017 Picture of Subsidized Households provides a snapshot of nearly 183,000 Massachusetts households that received federal housing assistance that year.¹⁶ The HUD data are similar to what is

¹⁵ These HUD datasets are prepared by the agency's Office of Policy Development and Research. Household data are aggregated by program at various the geographic summary levels and by local public housing agency (PHA). Covered programs include (but are not limited to) federal public housing, Housing Choice Vouchers, Section 8 project-based housing, New Construction and Substantial Rehabilitation, and the Section 202 and 811 Supportive Housing programs.

¹⁶ According to the PSH, there were nearly 195,000 units and vouchers available in Massachusetts in 2017, but tenant information was collected only on those units/vouchers that were in use at the time of reporting. Thus, while

collected under the state requirements and the reporting format is similar as well. Included in the HUD count were approximately 34,000 residents living in federal public housing and 62,000 privately-owned, federally subsidized units and more than 83,000 households who received rental assistance in the form of Section 8 certificates or housing vouchers.

The federal public housing units included in the HUD dataset are *not* subject to the state reporting requirements, but there is substantial duplication in the privately-owned subsidized housing and the tenant-based rental assistance. The 21,000 federal Housing Choice Vouchers DHCD receives annually from HUD, which are administered by the regional nonprofit agencies on DHCD's behalf, *are* included in the 83,000 households on which HUD reported. They cannot be broken out from the units HUD allocates directly to local housing authorities at the census tract or municipal level. The privately-owned, federally-assisted units HUD captures are also reported to the state if they received state subsidies and/or federal (LIHTCs) allocated by DHCD. The Massachusetts Data Collection Act is the primary source of tenant characteristics in the LIHTC inventory. While HUD maintains a national database of information on more than 46,000 LIHTC projects (nearly 3 million housing units), it does not report tenant characteristics for those living in tax credit units unless the project has received other HUD funding (project based subsidies, below-market-interest rate, etc.).¹⁷

Who Receives Housing Assistance? Characteristics of Residents Receiving Assistance Under Programs Covered by Massachusetts Reporting Requirements

Table 6.11 summarizes the characteristics of the residents and units for which information was reported in 2017 under the Data Collection Act. The table is organized by the major program types: privately-owned/publicly-subsidized housing,¹⁸ state-aided family public housing, state-aided elderly/disabled public housing (Chapter 667), and those mobile vouchers covered by the Act. (Note: Placements are made in the state Chapter 667 program to achieve a mixed population of elderly households in 86.5 percent of the units and persons with disabilities in 13.5 percent of the units, in accordance with the statute.)

there were 91,382 vouchers allocated to MA in 2017, data were available only on the 83,505 in use. Likewise, information is available only on occupied public and privately-owned federally assisted units. The PSH suppresses tenant information in projects with fewer than 12 units reporting. Some duplication has been identified in the HUD database, mostly involving developments originally funded under one program and subsequently assisted under another, for example, a Section 236 development that later received Low Income Housing Tax Credits. In some cases, the HUD inventory reports multiple developments as a single property.

¹⁷ The HUD database includes project address (and census tract), number of units and low-income units, number of bedrooms, year the credit was allocated, year the project was placed in service, whether the project was new construction or rehab, type of credit provided, and other sources of project financing.

¹⁸ Reporting is for housing assisted with state and/or federal financial assistance (excluding financial assistance under voucher programs, which are reported separately) that are administered by DHCD, MassHousing, MHP, and/or MassDevelopment.

Table 6.11: Summary of Unit, Resident Characteristics in Rental Housing Covered by MA Data Collection Requirements, 2017

Characteristic	Privately-owned Subsidized	State Public Housing - Chapters 200 and 705	State Public Housing - Section 667*	Total Mobile Vouchers Covered by Data Reporting Reqs.^	Total Project Based Vouchers Covered by Data Reporting Reqs.^
# Units (in thousands)	98.5	12	27.1	25.6	5.6
% Accessible mobility	8%	2%	4%	--	--
% Accessible sensory	3%	2%	4%	--	--
% 0 or 1BR units	56%**	7%	99%	25%	60%
% 2BR units	30%	41%	1%	38%	24%
% 3BR units	11%	4%	0%	30%	13%
% 4 or more BR units	2%	1%	0%	7%	4%
% Vacant	2%	5%	3%	--	--
% Occupied by ELI households (0-30%)	64%	84%	86%	82%	86%
% Occupied by VLI households (31-50%)	18%	12%	12%	15%	10%
% Occupied by LI households (51-80%)	17%	4%	2%	3%	4%
% Occupied by households above 80% AMI	1%	0%	0%	0%	0%
Single person household	56%	14%	91%	36%	57%
2 or 3 person household	34%	58%	9%	43%	33%
4 person household	6%	18%	0%	12%	6%
5 or more person household	3%	11%	0%	8%	4%
% Households w no children under 18	78%	36%	100%	53%	66%
% Households w 1 child under 18	13%	26%	0%	19%	16%
% Households w 2 children under 18	6%	22%	0%	15%	11%
% Households w 3 or more children under 18	2%	16%	0%	13%	6%
One person, non-elderly household	23%	7%	14%	18%	34%

Elderly household	43%	10%	84%	7%	17%
Single parent household, dependent child(ren)	25%	60%	0%	66%	43%
Two parent household, dependent child(ren)	4%	11%	0%	5%	3%
All other households	6%	12%	2%	4%	3%
White not Hispanic	43%	39%	82%	40%	54%
All racial/ethnic minority	57%	61%	18%	60%	46%
Black not Hispanic	19%	15%	4%	24%	16%
Asian not Hispanic	6%	6%	4%	1%	1%
Hispanic, all races	27%	38%	8%	33%	27%
Other race	2%	1%	1%	1%	2%
2 or more answers, at least one racial/ethnic minority	2%	1%	0%	1%	1%
Formerly homeless households	3%	NA	NA	NA	NA
In R/ECAPs	21.60%	12.00%	0.80%	15.70%	14.50%
In extreme poverty (40%+) R/ECAPs	13.60%	8.30%	0.30%	11.80%	10.00%
In Maj White CAPs	4.40%	0.50%	1.50%	2.30%	2.00%
In extreme poverty (40%+) Maj White CAPs	1.90%	0.00%	0.90%	0.50%	1.10%

Source: DHCD 2017 Housing Data Collection Act Reports

Notes: * Placements are made in the state Chapter 667 program to achieve a mixed population of elder households in 86.5 percent of the units and persons with disabilities in 13.5 percent of the units in accordance with the statute.

^ Includes only those federal Housing Choice vouchers administered by regional nonprofits on behalf of DHCD, not the federal vouchers administered by LHAs. The DHCD share of total federal Housing Choice Vouchers is about 25 percent. Regional Non-profits report both federal and state vouchers. Household type is not a required field for federal vouchers, thus the totals shown for this category are for the state assisted units only.

** Including SRO units; without these, the share of 0 and 1BR units in private subsidized housing would be 52.0%

Percentages are based on totals where data was provided and exclude blanks, other non-conforming responses.

As Table 6.11 illustrates, state-assisted housing in Massachusetts serves a diverse group of extremely low income families and individuals, but the extent of the racial and ethnic diversity varies by program. The residents of the state's elderly/disabled public housing are overwhelmingly non-Hispanic White (83%). The 2016 American Community Survey (ACS) estimates that 88 percent of all households headed by someone 65 or over are headed by a non-Hispanic White, as are nearly two-thirds of elders living below the poverty line. There has been a noticeable drop in the non-Hispanic White share of seniors living in poverty in recent years, however; the 2010 1-Year ACS had estimated that over 71 percent of seniors living in poverty were non-Hispanic Whites. The White share of those living in poverty overall also dropped during this period, though the drop was more modest (4% v 7%).

The state's family public housing, privately-owned subsidized inventory and mobile vouchers serve a more diverse population: 60 percent of those living in family public housing are households of color, as are 57 percent of those living in the privately-owned subsidized units and 60 percent of the residents with tenant-based vouchers. Family public housing includes a higher share of three or more bedroom units and serves a higher percentage of families with children, large families and single parent households than the privately owned housing does, but there are so many more units in the privately-owned inventory, it serves many more families.

Characteristics of Residents Receiving Federal Housing Assistance Including Those in Units or with Vouchers Not Covered by Chapter 334

HUD's 2017 Picture of Subsidized Households provides substantially similar information on about 183,000 Massachusetts households that received federal housing assistance that year (**Table 6.12**). As described in the introduction to this section, the major difference is that the HUD data include some 34,000 federal public housing units not covered by the state statute and a total of 83,000 federal housing vouchers, *including* the 22,000 that were covered by the state reporting requirements. It is unknown exactly how many of the roughly 63,000 private developments included in **Table 6.10** (Project-based Section 8 and Sections 202 and 811) also reported to DHCD, but the overlap is clearly substantial. As is to be expected given the extent of the overlap, the HUD data reveals patterns similar to DHCD's in terms of the race, ethnicity and income of households being served. HUD collects more detailed information on disability status of assisted householders, and family members, documenting that 44 percent of all assisted householders (or their spouses) under age 62 have a disability, as do 42 percent of those over age 62.¹⁹ As was apparent in the state data, different programs have benefited different types of households. HUD's Section 202 and Section 811 programs are specifically targeted to special populations – Supportive Housing for the Elderly (202) and Supportive Housing for Persons with Disabilities (811).

¹⁹ DHCD also collects data on units with income deductions for persons with disabilities in applicable state-aided public housing and state rental assistance programs; however, because the deductions only apply to some of DHCD programs (in contrast with the reported HUD programs), the data are not as comprehensive as the HUD data. Under the State Data Collection Act, the state-aided family public housing and MRVP programs apply such a deduction to households with a member with a disability in accordance with 760 CMR 6.05(4)(a) and 760 CMR 49.05(5)(d)(1), respectively. Based on reporting of deductions, sixteen percent of the state family public housing units were identified as serving a household with a tenant with a disability, as were approximately 45 percent of the MRVP vouchers administered by the regional non-profits and approximately 45 percent of those administered by the LHAs.

Table 6.12: Summary of Unit, Resident Characteristics in HUD-Assisted Rental Housing in Massachusetts, 2009 Picture of Subsidized Households

	Summary of All HUD Programs	Federal Public Housing	Housing Choice Vouchers	Project Based Section 8	Section 202	Section 811	S236/ BMIR
Subsidized units available	194,522	34,424	91,382	58,375	3,841	973	3,157
% Occupied	94	98	92	96	98	95	NA
# Reported	182,961	33,548	85,303	55,815	3,816	938	1,107
% Reported	100	100	100	100	100	100	NA
% moved in past year	7	7	6	7	10	11	NA
Number of people per unit	1.9	1.9	2.2	1.6	1.1	1	NA
Number of people: total	350,433	63,528	183,712	91,518	4,245	957	NA
Avg Family Expenditure/mo	\$416	\$398	\$441	\$390	\$351	\$293	NA
Avg HUD Expenditure/mo	\$971	\$515	\$982	\$1,282	\$528	\$580	NA
Household income/year	\$17,486	\$17,769	\$17,801	\$16,927	\$15,888	\$12,359	NA
Household income/year per person	\$9,129	\$9,383	\$8,266	\$10,324	\$14,282	\$12,113	NA
% \$1 - \$4,999	5	5	4	5	4	2	NA
% \$5,000 - \$9,999	15	16	16	13	12	36	NA
% \$10,000 - \$14,999	34	36	33	35	36	40	NA
% \$15,000 - \$19,999	16	15	16	18	22	14	NA
% \$20,000 or more	30	28	31	28	25	9	NA
% Households where wages are major source of income	26	26	31	21	2	4	NA
% Households where welfare is major source of income	4	4	4	3	3	0	NA
% Households with other major sources of income	67	67	62	74	95	93	NA
% of local median (Household income)	24	24	23	24	24	19	NA
% very low income	94	92	94	95	98	100	NA
% extremely low income	75	75	75	74	73	92	NA
% 2+ adults with children	4	4	4	3	0	0	NA
% 1 adult with children	27	23	35	17	0	0	NA
% female head	73	67	79	69	69	37	NA
% female head with children	27	24	36	18	0	0	NA
% w disability, among Head, Spouse, Co-head, aged 61 yrs or less	44	46	46	37	33	99	NA
% w disability, among Head, Spouse, Co-head, aged 62 yrs or older	42	53	66	24	7	98	NA
% w disability, among all persons in households	27	31	30	19	7	98	NA
% 24 years or less (Head or spouse)	2	2	1	2	NA	3	NA
% 25 to 49 years (Head or spouse)	36	32	47	25	NA	37	NA
% 51 to 60 (Head or spouse)	22	21	27	15	0	35	NA
% 62 or more (Head or spouse)	40	45	25	58	100	25	NA
% 85 or more (Head or spouse)	5	5	2	10	21	1	NA
% White Non-Hispanic	43	36	43	44	64	72	NA
% Minority	56	64	57	51	30	19	NA
% Black Non-Hispanic	20	21	23	16	12	10	NA
% Asian or Pacific Islander Non-Hispanic	5	7	3	7	7	2	NA
% Hispanic	30	35	30	27	11	7	NA
Average months on waiting list	35	27	42	NA	NA	NA	NA
Average months since moved in	125	117	134	120	85	97	NA
% 0 - 1 bedrooms:	49	57	34	63	100	97	NA
% 2 bedrooms	28	23	34	25	NA	3	NA
% 3+ bedrooms	23	20	32	12	NA	0	NA
% Overhoused	13	9	18	8	NA	2	NA
% in poverty (Census tract)	23	28	20	24	16	14	NA
% minority (Census tract)	47	51	45	47	36	30	NA
% single family owners (Census tract)	26	20	29	24	38	44	NA

Notes: Occupied units as % of available, for vouchers, this is the utilization rate, * Not Hispanic, # Whoever is older. Percentages may not sum to 100 due to rounding. Does not distinguish between units administered by DHCD, local housing authorities and other entities.

Source: Department of Housing and Urban Development, A Picture of Subsidized Households: 2009
<http://www.huduser.org/portal/picture/picture2009.html>

Demographic Characteristics of Households Receiving Federal or State Assistance Compared to the Income Eligible Population

The housing resources that are available to assist low income families and individuals in Massachusetts have effectively targeted extremely low income households. These resources also serve a diverse group of households. (This is true of programs that report resident characteristics directly to HUD as well as those that report to DHCD under the Massachusetts Data Collection Act.) **Table 6.13** summarizes the racial and ethnic breakdown of households assisted by major program category from both sources. This table also shows the racial and ethnic breakdown of the Commonwealth's extremely low and very low income households – the programs' intended beneficiaries – for comparison. Overall and in most program categories, Black and Latino households are assisted at a higher rate than Whites and Asians, based on each group's share of extremely low and very low income renter households.

Table 6.13: Distribution of Renter Households Assisted with Federal and State Housing Subsidies by Race/Ethnicity

	White*	Black*	Asian*	Hispanic	All Other
Share of MA ELI (<30%) Renter HHs	56%	12%	6%	23%	3%
Share of MA ELI and VLI Renter HHs (<50%)	58%	12%	5%	22%	3%
<i>Share of HHs assisted:</i>					
in Privately-owned subsidized housing	44%	20%	6%	27%	2%
in State family public housing	40%	16%	6%	37%	1%
in State elderly public housing	83%	4%	4%	8%	1%
in Federal public housing	36%	21%	7%	35%	1%
with State vouchers (mobile and project-based)	40%	24%	1%	34%	1%
with Federal vouchers (mobile and project-based)	43%	23%	3%	30%	1%

Source: 2017 MA State Data Collection Reports and HUD's 2017 Picture of Subsidized Households, 2010-2014 American Community Survey-based CHAS tabulations. *Indicates "race alone" (not Hispanic).

Table 6.14 arrays the housing assistance programs in a similar way to illustrate their effectiveness at targeting the lowest income households. Of renter households earning no more than 80 percent of the area median income – those income eligible for housing assistance – nearly half (49%) are extremely low income, 26 percent are very low income and 25 percent are low income. Table 6.12 shows that all of the major categories of housing assistance overwhelmingly benefit extremely low income households. While a similar breakdown is not available for federal public housing or for federal housing vouchers *not* covered by the MA Data Collection Law, the Picture of Subsidized Households reports that 53 percent of all federal voucher holders in MA earned less than \$15,000 in 2017, as did 57 percent of households living in federal public housing; 69 percent of voucher households and 72 percent of federal public housing households had incomes of less than \$20,000 annually.²⁰

These findings – the demographic and income characteristics of households receiving state and federal housing assistance -- have changed little over the decade since DHCD began monitoring. While the available housing resources fall far short of need, the Commonwealth's programs – those funded and administered by the state as well as those funded by the federal government – continue to do an effective job of targeting assistance to those most in need.

²⁰ The PSH reports that 75 percent of households served by federal public housing are ELI and 92 percent are ELI and VLI combined; low income (<80%) is not reported. The comparable figures for federal Housing Choice Vouchers are 75 percent and 94 percent.

Table 6.14: Distribution of Renter Households Assisted with Federal and State Housing Subsidies by Income Category

	% ELI	% VLI	% LI
Share of Income Eligible ($\leq$ 80% AMI) Renter HHs by Income Category	50%	26%	24%
<i>Share of HHs assisted:</i>			
in Privately-owned subsidized housing	65%	19%	17%
in State family public housing	84%	12%	4%
in State elderly/disabled public housing	86%	12%	2%
with mobile vouchers covered by MA Data Reporting Requirements	82%	15%	3%
with project based vouchers covered by MA Data Reporting Requirements	86%	10%	4%

Source: 2017 MA State Data Collection Reports and HUD's 2017 Picture of Subsidized Households, 2010-2014 American Community Survey-based CHAS tabulations.

Does not include federal Housing Choice Vouchers administered by Local Housing Authorities, which represent about three-quarters of the federal vouchers in use in MA.

Location of Subsidized Housing

Table 6.15 summarizes the distribution, by region, of housing assistance reported for 2017 under the Massachusetts Data Collection Act. This table demonstrates that the distribution of housing assistance (units and vouchers) closely reflects the distribution of need, based on each region's share of the state's extremely low and very low income renter households. The Boston region, however, with its substantial inventory of older public housing and subsidized housing created under the Great Society programs of the 1960s and early 1970s – and its strong network of experienced for-profit and nonprofit affordable housing developers – provides a disproportionate share of the state's subsidized “bricks and mortar.”

Table 6.15: Distribution of Renter Households with Federal and State Housing Subsidies by Region

	Berkshire	Boston	Cape & Islands	Central	Northeast	Pioneer Valley	Southeast	MA
% of State's ELI and VLI Renters	2%	48%	2%	11%	12%	12%	13%	100%
% of State Public Housing Units	2%	44%	2%	9%	16%	12%	14%	100%
% of Privately-owned Subsidized Units	2%	54%	3%	9%	10%	13%	9%	100%
% of State Rental Assistance	1%	44%	5%	8%	12%	17%	13%	100%
% of Federal Public Housing Units	1%	55%	1%	9%	6%	9%	18%	100%
% of Federal Housing Vouchers*	2%	48%	2%	9%	12%	13%	13%	100%
% of Public/Subsidized Units^	2%	52%	2%	9%	11%	12%	12%	100%
% of Total Housing Assistance^	2%	50%	2%	9%	11%	13%	12%	100%

* All MA federal vouchers including those administered by the regional non-profits on DHCD's behalf

^ Includes just those programs/resources included in 2017 reporting

Source: 2017 MA State Data Collection Reports and HUD's 2017 Picture of Subsidized Households, 2010-2014 American Community Survey-based CHAS tabulations.

Assisted Rental Housing in Areas of Concentrated Poverty

The 2017 data collected by DHCD was also analyzed by census tract to determine the extent to which assisted housing is concentrated in high poverty areas, in particular, racially concentrated high poverty areas and the degree to which such concentration differs by tenant, program or unit characteristics. As described in Section 4, a census tract is considered a racially or ethnically concentrated area of poverty (R/ECAP) if the majority of residents are people of color *and* its poverty rate is the lower of 40 percent *or* three times the average tract rate for the metropolitan or micropolitan area in which it is located. The same threshold is used for identifying high poverty tracts where the majority of residents are non-Hispanic White (called WCAPs). These are both very high thresholds.

As discussed in Section 4, just 91 of the more than 1,450 populated census tracts in Massachusetts meet this high poverty threshold. Of these, 67 are racially concentrated. Only 11 municipalities have any tracts identified as R/ECAPs, and only 9 have majority White concentrated poverty tracts. These pockets of poverty are highly concentrated in just a handful of cities. Boston, Springfield and Worcester, which together represent less than 15 percent of the state's total population, are home to two-thirds of the population that lives in concentrated poverty census tracts. Lawrence and Holyoke, which together represent less than two percent of the state's population, are home to more than 9 percent of the concentrated poverty population. The effect of decisions made decades ago that led to the creation of tens of thousands of units of public and subsidized housing in low income urban areas is addressed in Sections 3 and 4.

The share of assisted housing that is in high poverty areas and the share of housing vouchers that are used in such areas are summarized in **Table 6.16**. Twenty-six percent of the state's privately-owned subsidized housing is located in high poverty census tracts (21.6% in racially/ethnically concentrated areas – R/ECAPs – and 4.4% in majority White tracts). The state-funded public housing is much less concentrated, with 5.4 percent in high poverty areas overall (4.2% in racially concentrated areas). There is considerable difference, however, between the family inventory and the elderly/disabled inventory, with 12.5 percent of the state's family public housing in R/ECAPs (and 0.5% in majority White high poverty tracts) compared to 2.3 percent of the elderly/disabled housing (0.8% in R/ECAPs, 1.5% in majority White high poverty tracts). The assisted housing that is most heavily concentrated in R/ECAPs, and high poverty areas generally, is the federal public housing inventory. Over half (51.7%) of the unrestricted (family) federal units are in areas of concentrated poverty (40.6% in R/ECAPs and 10.1% in majority White CAPs) as are 27 percent of the elderly federal developments (25.0% in R/ECAPs, 2.0% majority White).

Table 6.16: Rental Housing Assistance in Areas of Concentrated Poverty

	Total Units/Vouchers Included in Analysis (in thousands)	Percent of units in...				Extreme Poverty (40%+) R/ECAPs	Extreme Poverty (40%+) Maj. White CAPs
		Total High Poverty	R/ECAPs	Maj. White CAPs	Total Extreme Poverty (40%+)		
Privately-owned Subsidized Housing	98.5	26.0%	21.6%	4.4%	15.5%	13.6%	1.9%
MA State Public Housing	39.6	5.4%	4.2%	1.2%	3.4%	2.7%	0.6%
<i>MA State Public Housing - elderly/disabled</i>	<i>27.1</i>	<i>2.3%</i>	<i>0.8%</i>	<i>1.5%</i>	<i>1.2%</i>	<i>0.3%</i>	<i>0.9%</i>
<i>MA State Public Housing - family/unrestricted</i>	<i>12.1</i>	<i>12.5%</i>	<i>12.0%</i>	<i>0.5%</i>	<i>8.3%</i>	<i>8.3%</i>	<i>0.0%</i>
<i>MA State Public Housing - special needs</i>	<i>0.4</i>	<i>3.0%</i>	<i>1.1%</i>	<i>1.9%</i>	<i>3.0%</i>	<i>1.1%</i>	<i>1.9%</i>
All Federal Housing Choice Vouchers	84.4^	14.1%	12.2%	1.9%	7.9%	7.4%	0.5%
MA Rental Vouchers	8.1	18.6%	16.3%	2.3%	11.9%	11.2%	0.8%
Federal Public Housing	34.4*	37.9%	32.1%	5.8%	24.5%	24.3%	0.2%
<i>Federal Public Housing - elderly/disabled</i>	<i>17.6</i>	<i>27.0%</i>	<i>25.0%</i>	<i>2.0%</i>	<i>20.5%</i>	<i>20.2%</i>	<i>0.3%</i>
<i>Federal Public Housing - family/unrestricted</i>	<i>16.3</i>	<i>50.7%</i>	<i>40.6%</i>	<i>10.1%</i>	<i>29.7%</i>	<i>29.5%</i>	<i>0.2%</i>

Source: 2017 MA State Data Collection Reports and HUD's 2017 Picture of Subsidized Households

* Includes federal vouchers allocated to DHCD and administered by the 8 regional nonprofit agencies; excludes vouchers for which census tract was not available ^ Total is greater than sum of elderly and family units. In two cases, HUD reported combined data for clusters of family and elderly developments.

Tenants with Vouchers Cluster in High Poverty Areas

The housing choice voucher (HCV) program is the federal government's major program for assisting very low-income families, including the elderly, and those with disabilities, to rent decent and affordable housing in the private market. Since housing assistance is provided on behalf of a family or individual,

participants are able to find their own housing, including single-family homes, townhouses and apartments. A voucher holder is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects. One of the expressed goals of the HCV program is to help poor households break out of the cycle of poverty by locating in neighborhoods with numerous opportunities for gainful employment, good schools, and racial and ethnic integration. The 2017 data collected by DHCD under the Massachusetts Data Collection Act and that collected by HUD for its Picture of Subsidized Households document that many voucher holders do, in fact, use their vouchers to secure housing in areas that are not high-poverty. Indeed, of more than 1,450 populated census tracts in Massachusetts, only 61 did not have at least one voucher in use in 2017. The comparable number – still impressive – in 2009 was 151. **Table 6.14** also documents where tenant vouchers, the subject of the following section, are being utilized. This breadth of distribution notwithstanding, voucher utilization remains highly concentrated in high poverty areas. As several advisory committee members and others in the advocacy community have observed, this is due in part to the voucher rent limits and in part due to the number of owners willing to accept vouchers. (See **Inset 6.2**).

More than 14 percent of households with tenant-based HCVs used their voucher to rent a home in a high poverty census tract, nearly all (12.2%) in a racially/ethnically concentrated tract, but as **Table 6.17** illustrates, there is substantial variation by race and ethnicity. Just 6.5 percent of White voucher holders rented in high poverty areas (3.4% in R/ECAPs, 3.1% in high poverty White areas) compared to 26.8 percent of Hispanic voucher holders (22.7% in R/ECAPs, 4.1% in majority White high poverty areas). The corresponding figures for Blacks and Asians were 14.9 percent and 14.4 percent (with 12.8% and 11.6% respectively in R/ECAPs).

Table 6.17 also depicts the substantial share of vouchers being utilized in areas that are very low income, even though they do not rise to the “3 times the average poverty rate, or 40 percent threshold” required to be considered high, or concentrated, poverty under the HUD definition. A “very low income” census tract is one in which the median family income (MFI) is less than 50 percent that of the MSA.²¹ The final point this table makes is that voucher holders in all of the major racial/ethnic groups are *more likely* than other members of their income group to live in high poverty or very low income areas. While the share of White households living in low income or high poverty census tracts is much lower than it is for the other racial/ethnic groups, the disparity is much greater for White voucher holders (that is, they are much more likely than other White households in the same income group to live in high poverty areas).

Housing Vouchers and Affordability

Rental assistance works to narrow the gap between the listed rental price and what households can afford to pay, based on federal income guidelines. The Massachusetts rental voucher program, funded through the state operating budget, supports both tenant-based and project-based vouchers. Mobile vouchers issued under the federal Housing Choice Voucher program represent only one of the types of rental assistance available in Massachusetts; in addition to Section 8 project-based vouchers, the Federal government supports certain long-term project-based Section 8 rental assistance contracts, as well as rental assistance targeted to households with disabilities under the Section 811 program, while the Massachusetts rental voucher program, funded through the state operating budget, supports both tenant-based and project-based vouchers. About 75% of the federal Housing Choice Vouchers in Massachusetts are administered by local housing authorities, rather than DHCD.

DHCD is in the process of developing a voucher management system that will, for the first time, provide more detailed, up-to-date information regarding utilization of tenant-based vouchers under state

²¹ This is a generally accepted definition of a low-income area under the Community Development Block Grant, Home Mortgage Disclosure Act (HMDA) and Community Reinvestment Act (CRA) rules although what the 50 percent threshold is called differs from program to program. The 50 percent threshold is called low-income (and 80 percent moderate-income) under these programs, but it is more widely accepted now as “very low,” consistent with federal Section 8 definitions.

programs. Because the best currently available data relates to mobile vouchers issued through DHCD under its Housing Choice Voucher program, and because DHCD is one of a small number of agencies nationwide authorized by HUD to exercise certain program flexibility under the “Moving to Work” program, this section focuses exclusively on DHCD’s mobile HCVs as a subset of rental assistance programs. However, the related data on housing affordability in general is relevant to all rental assistance programs. The data reveals persistent gaps between the amount of assistance offered combined with the amount a household can afford to pay, and the cost of rent, particularly in regard to three protected classes; family status, race, and disability.

Fair Market Rent and Housing Affordability

As noted in Section 2, income differences and varying housing costs across Massachusetts make affordability difficult to define, as “affordability” in many ways is a local issue. In an effort to more closely represent this, HUD recognizes 19 separate Fair Market Rent (FMR) Areas, or HUD Metro FMR Areas (HMFAs), in Massachusetts. HUD’s calculation of FMR is intended to determine rents at the 40th or 50th percentile point within the rent distribution of standard-quality rental housing units in each geographic region. FMRs are used to determine payment standards for the Housing Choice Voucher program, as well as rent levels in certain other federal housing assistance programs.²² The determination of “Fair Market Rent” is not a determination of fairness or equity; rather, it is a calculation of prevailing rents in a particular geography for standard, non-luxury, non-subsidized housing units. For this purpose, “rent” means the amount charged by the landlord plus a reasonable allowance for any utilities not included in that amount. **Inset 6.2** describes a study undertaken at DHCD’s request to inform the development of its housing mobility program. Among other things, this study looked at the impact of using Small Area Fair Market Rent (SAFMR), a calculation of FMR based on zip codes rather than HMFAs. DHCD is considering the implications of this study.

Inset 6.2: Massachusetts 2017 Rental Market Analysis for DHCD Voucher Holders

In 2017, at the request of DHCD, The American City Coalition (TACC) undertook a rental market analysis to inform the development of a pilot housing mobility program. They sought to understand:

- The geography of the opportunity areas across Massachusetts, based on select indicators of neighborhood opportunity; and
- The availability and cost of rental housing that could be accessed by DHCD’s Moving to Work (MTW) Housing Choice Voucher (HCV) holders in select opportunity areas.

TACC based its assessment on a synthesis of rental market data and neighborhood indicators from multiple sources, including: DHCD’s administrative data on Moving to Work (MTW) voucher households, Diversitydatakids.org’s Child Opportunity Index (COI), prepared by the Kirwan Institute, HUD’s Affirmatively Furthering Fair Housing indices and Small Area Fair Market Rents (SAFMRs), the American Community Survey data, and TACC’s own online rental listing research. The HUD SAFMRs are HUD’s calculation of FMR for ZIP Codes rather than for HUD Metro FMR Areas. The DHCD dataset included de-identified information on nearly 16,000 current voucher households. The final dataset of over 27,000 unique apartment listings included data such as listing date, location, number of bedrooms, and listing price. Each unit listing was geocoded to identify the census tract and to pair with the COI, AFFH indices, and ACS rental data.

This assessment used a comprehensive neighborhood opportunity index developed for Diversitydatakids.org by the Kirwan Institute Index (the COI), which included 19 indicators that measure

²² HUD utilizes the same regional boundaries in determining income limits for a variety of HUD programs, based on estimates of the median family income in each region, as well as the income thresholds for what is considered “extremely low income” (30 percent of area median income, also referred to as AMI), “very low income” (50 percent of AMI), and “low income” (80 percent of AMI). All HUD income calculations are adjusted for household size.

opportunity across three core areas known to be critical for healthy child development and positive life outcomes: quality educational settings, health and environment, and social and economic environments. The assessment used the COI for the Commonwealth's four major metropolitan areas: Boston, Springfield, Worcester, and Providence (Bristol County). The assessment also included five composite neighborhood measures from HUD's AFFH Tool: low-poverty, labor market, school proficiency, environmental health, low-cost transportation, and transportation trips.

DHCD hoped the study might identify:

- What the geographic distribution of higher opportunity areas across the Commonwealth was
- What the geographic distribution of current voucher utilization was
- What the distribution of units affordable to voucher holders using current DHCD payment standards across higher opportunity areas was, and
- What the distribution of units affordable to voucher holders using HUD's proposed Small Area FMR payments might be.

The TACC regions closely corresponded to the regions used in this AI, but with MetroWest (Southern Middlesex Opportunity Council region) as a distinct region carved out of the Central and Greater Boston regions. TACC's analysis of all available housing units listed online through websites like Craigslist for October 2017 revealed a total of over 26,000 available units, only a quarter of which were affordable for voucher holders assuming a voucher payment standard equal to the HUD SAFMR. Just half that number were affordable at the (then) current DHCD payment schedule. Only 13 percent of the units available statewide at the SAFMRs were located in areas that ranked high or very high on the Kirwan index, and fewer than 4 percent were available at the DHCD payment standard. The MetroWest region had the largest percentage of affordable units in areas that ranked highest on the index, at almost 37 percent.

Available Units w High/Very High Scores on the Kirwan COI available at/under DHCD Payment Standard

Region	Total Listings	High/ Very High Listings		High / Very High at the Payment Standard*	
		Count	Percent	Count	Percent
Northeast	4,135	809	19.6%	93	11.5%
Pioneer Valley	1,282	830	64.7%	361	43.5%
Greater Boston	16,962	9,767	57.6%	2,506	25.7%
Central	1,670	655	39.2%	195	29.8%
<u>MetroWest</u>	1,193	725	60.8%	266	36.7%
Southeast	1,129	453	40.1%	112	24.7%
Total	26,371	13,239	50.2%	3,533	13.4%

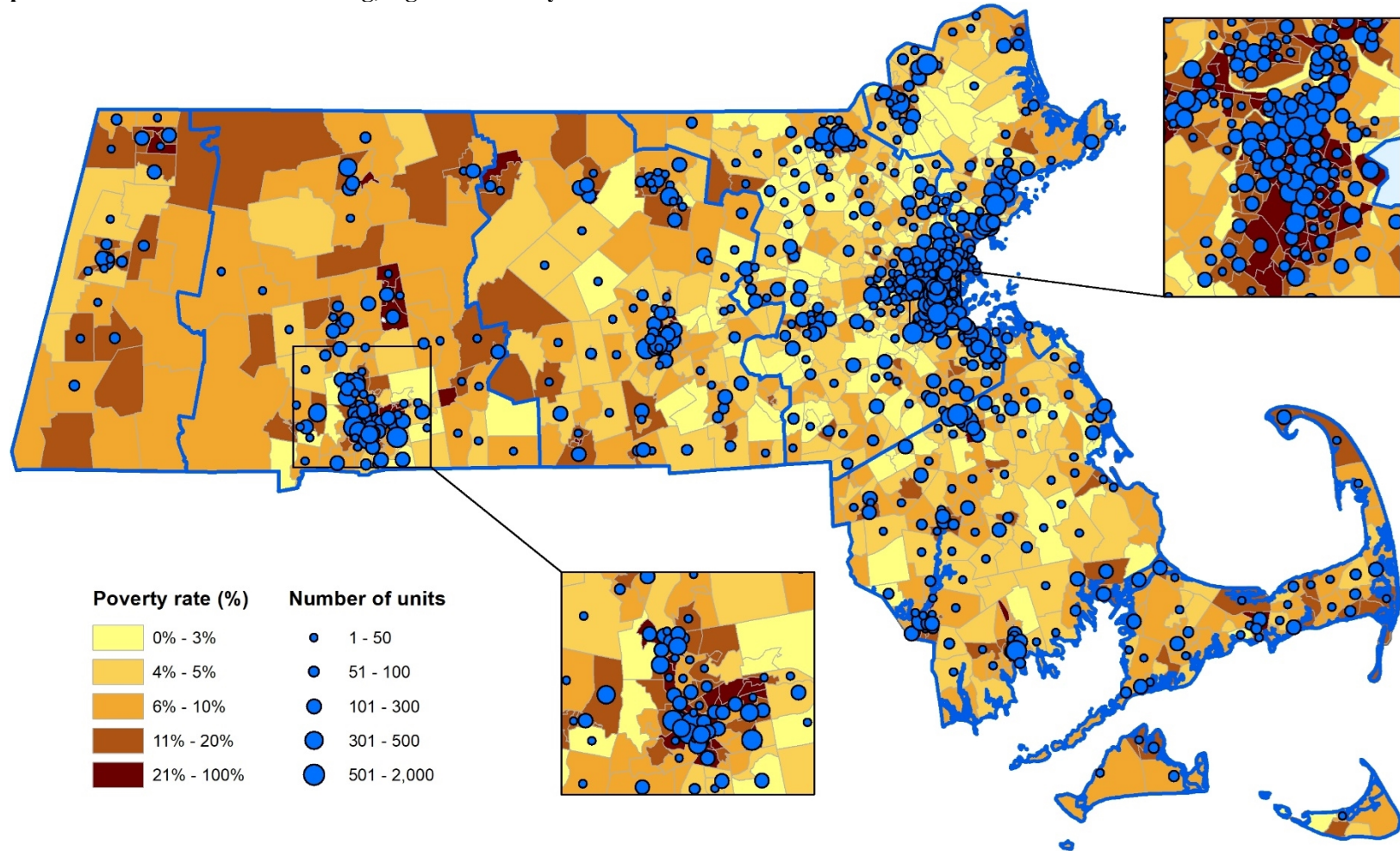
Source: The American City Coalition, Massachusetts Rental Market Analysis for DHCD Voucher Holders, 2017

TACC also looked at where voucher recipients needing 3 bedroom apartments were living. As noted elsewhere in the AI, families have reported difficulty in finding apartments in areas of interest that were large enough and that would accept vouchers. The report found that only 18 percent of the voucher holders living with children in units that had three or more bedrooms (statewide) were in areas with moderate to very high levels of access on the Kirwan COI. The MetroWest region has the largest number of three-bedroom apartments in areas that scored highly on the Kirwan COI, at 52 percent. The Northeast had the fewest such units, at 10 percent.

These figures suggest the higher costs and limited availability of larger units in areas that scored highly across the Kirwan Institute's COI may prevent families with vouchers from accessing housing appropriate to their needs. In particular, this data suggests that families with children are limited in where they can find a three-bedroom apartment.

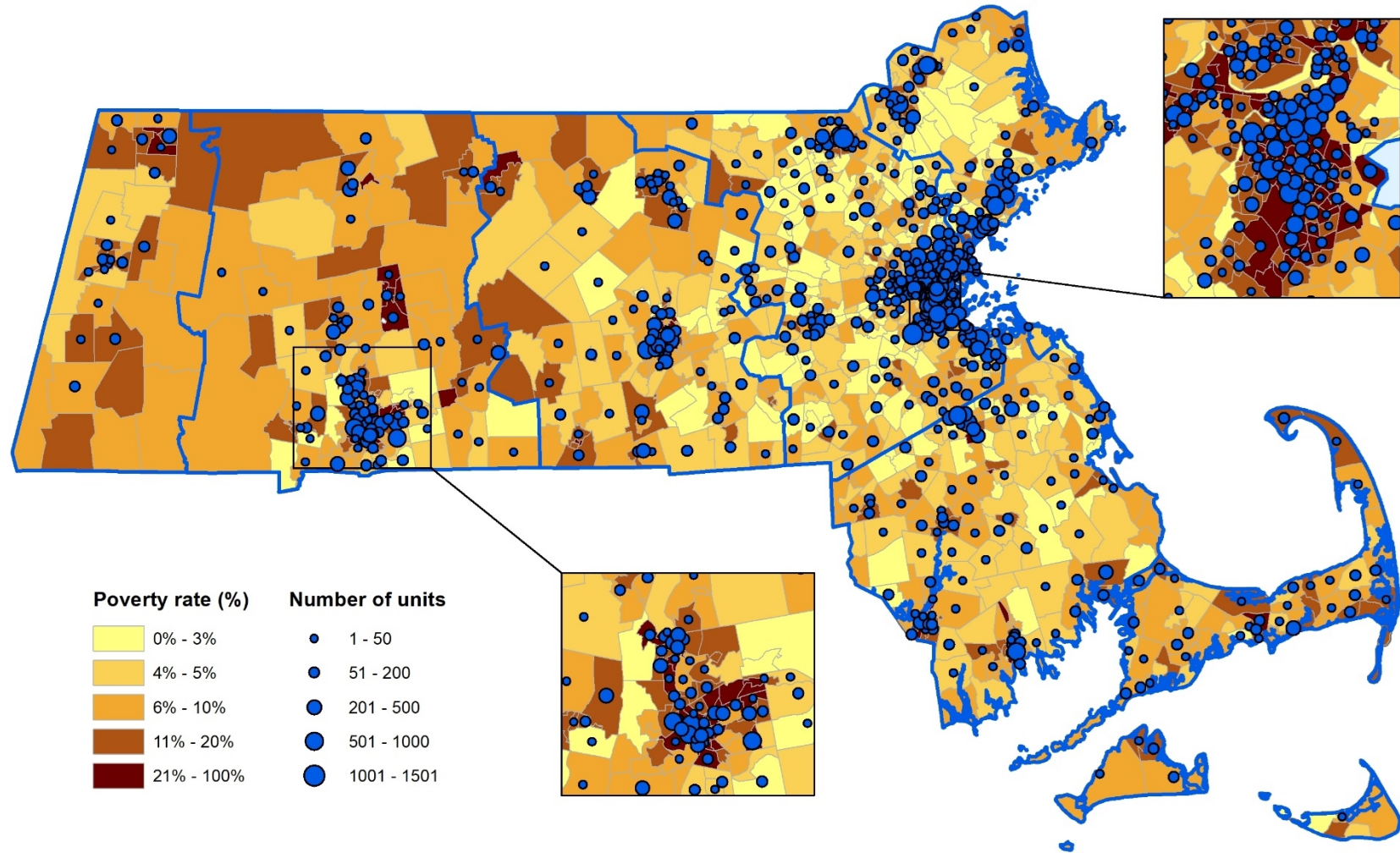
Maps 6.1-6.8 graphically illustrate voucher utilization across the state. These maps depict the distribution, by race of the voucher holder, of federal Housing Choice vouchers (and Section 8 certificates) reported in HUD's 2017 Picture of Subsidized Households, including those allocated to DHCD.

Map 6.1: Private Subsidized Housing, Against Poverty Level of Census Tract



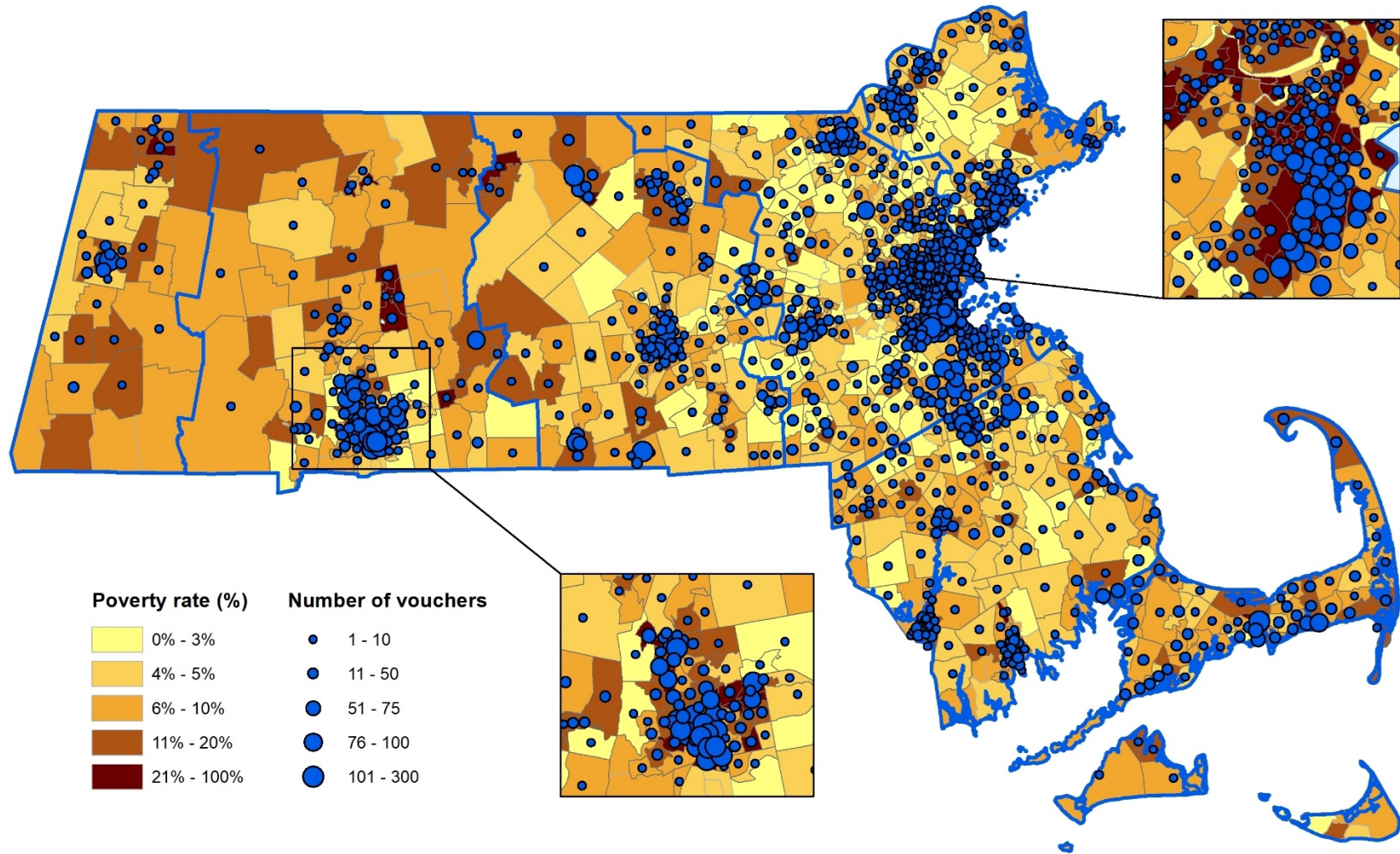
Source: Calculations by Bonnie Heudorfer, based on DHCD's Data Collection for Government Assisted Housing in Massachusetts, 2017 (number of units) and 5-year ACS, 2016 (poverty rate). UMDI mapping.

Map 6.2: State Public Housing, Against Poverty Level of Census Tract



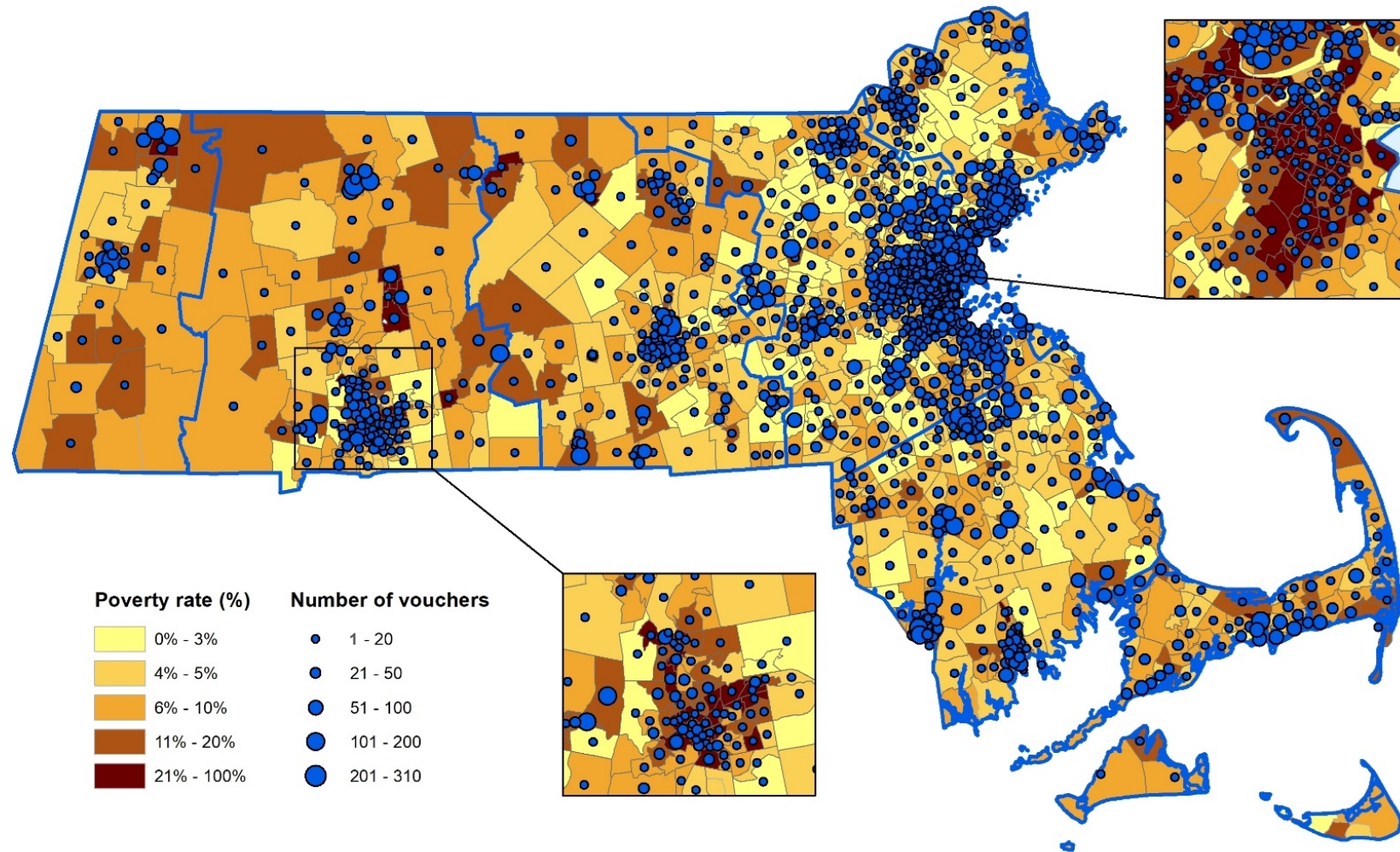
Source: Calculations by Bonnie Heudorfer, based on DHCD's Data Collection for Government Assisted Housing in Massachusetts, 2017 (number of units) and 5-year ACS, 2016 (poverty rate). UMDI mapping.

Map 6.3: Tenant-Based Rent Vouchers in Use, 2017, Against Poverty Level of Census Tract
Includes only vouchers covered by the MA Data Collection Act.



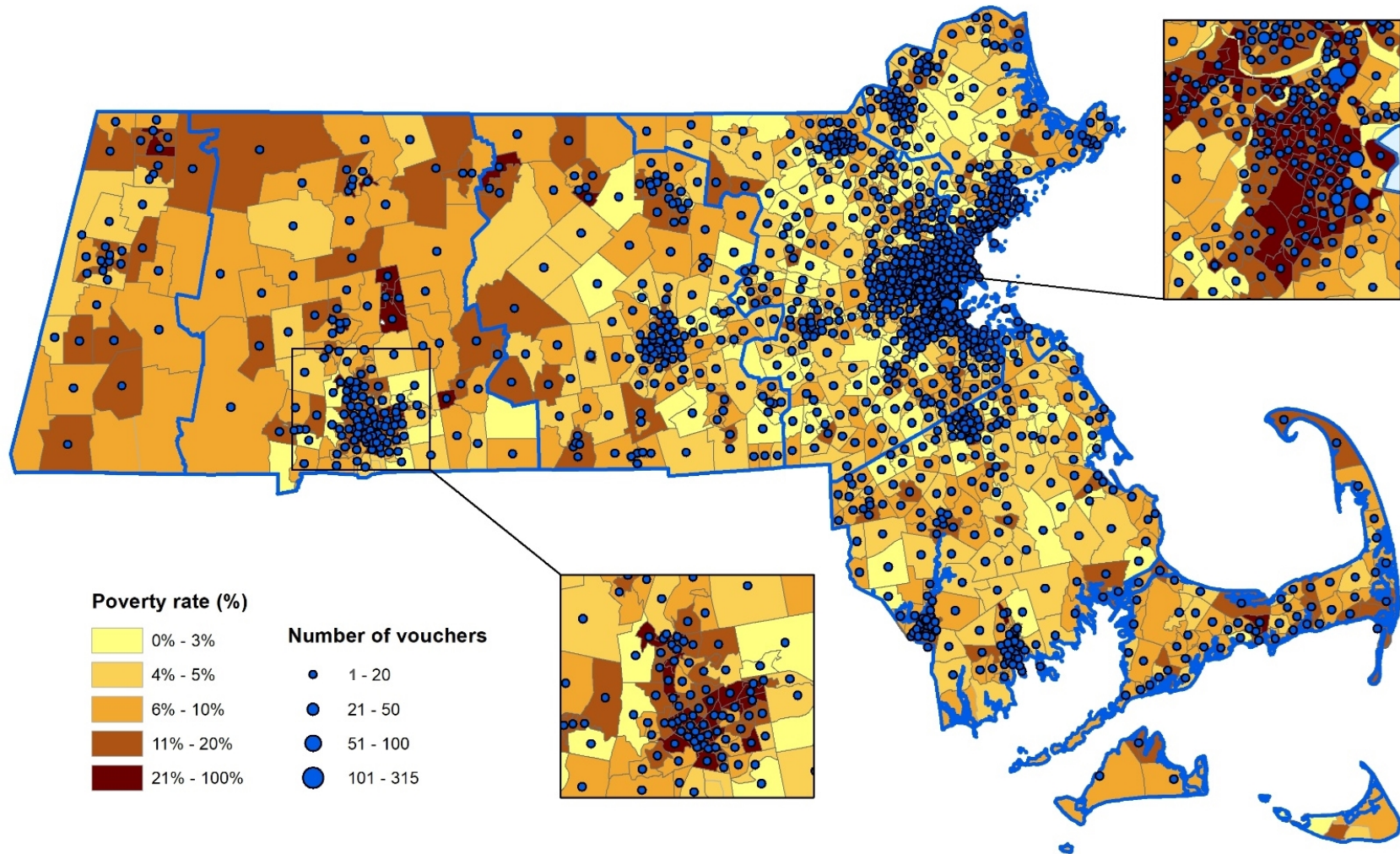
Source: Calculations by Bonnie Heudorfer, based on DHCD's Data Collection for Government Assisted Housing in Massachusetts, 2017 (number of units) and 5-year ACS, 2016 (poverty rate). UMDI mapping.

Map 6.4: Vouchers Used by White Households, Against Poverty Level of Census Tract
Includes those administered by LHAs



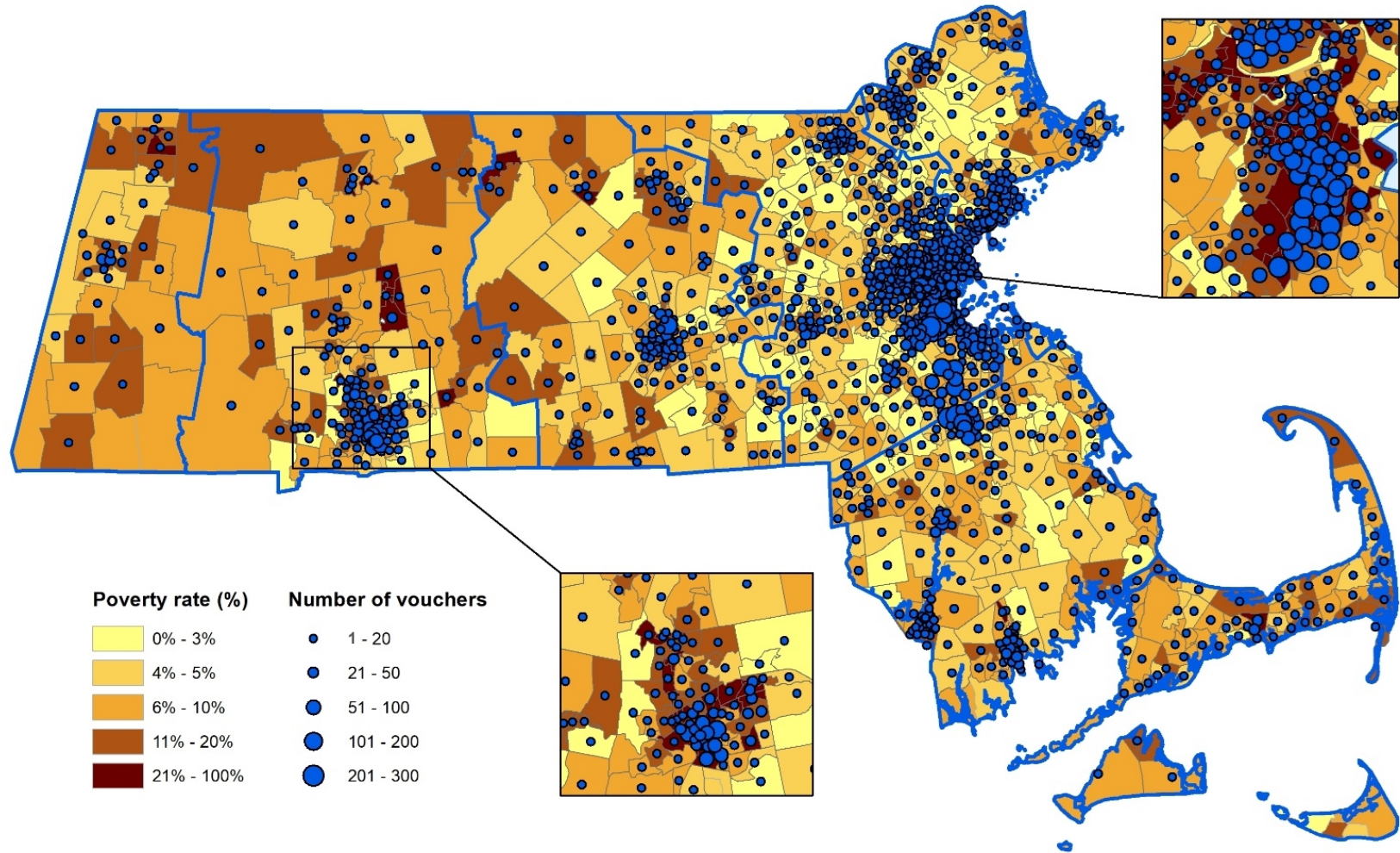
Source: Calculations by Bonnie Heudorfer, based on HUD's Picture of Subsidized Households, 2017 (number of units) and 5-year ACS, 2016 (poverty rate). UMDI mapping.

Map 6.5: Vouchers Used by Asian Households, Against Poverty Level of Census Tract
Includes those administered by LHAs



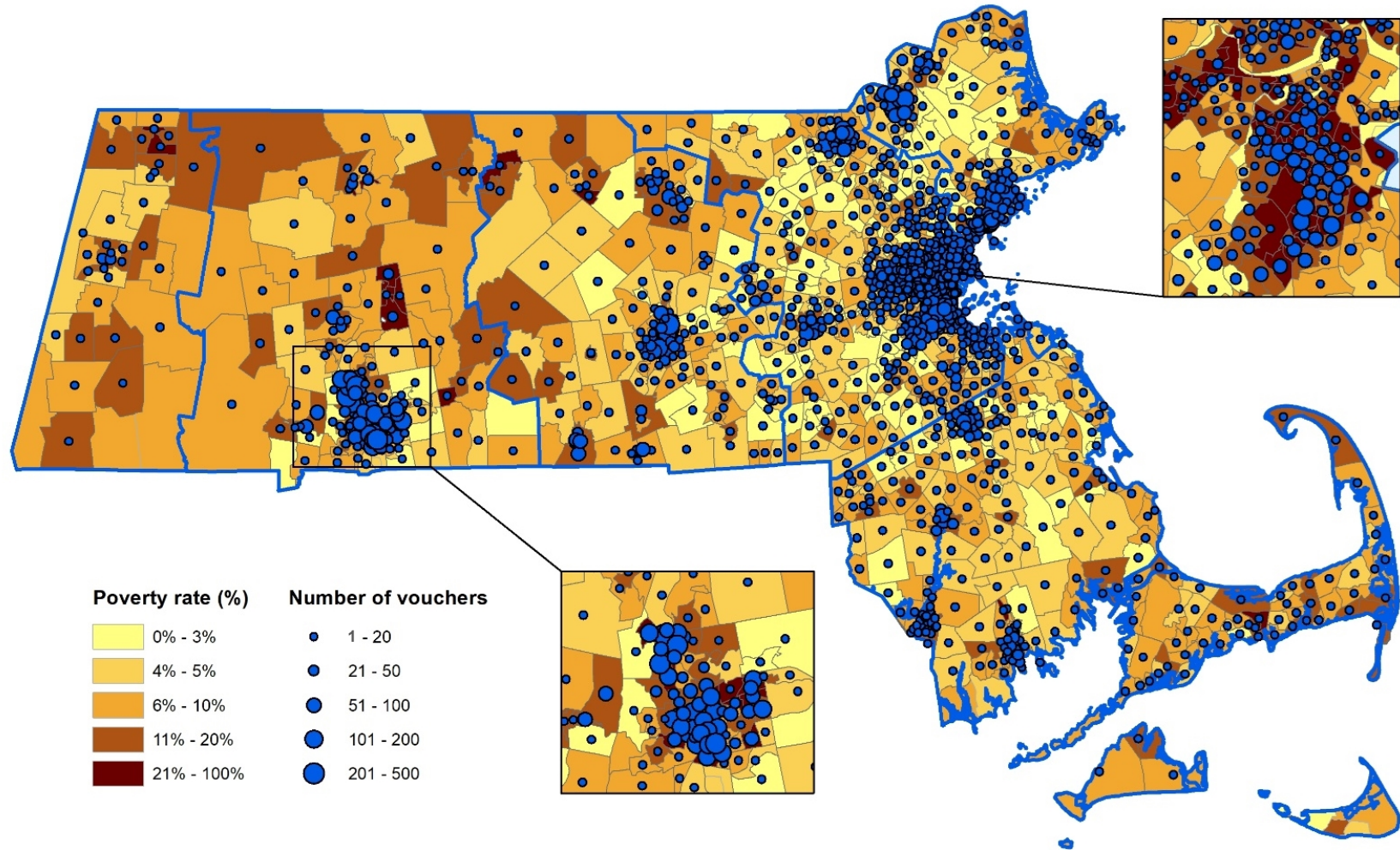
Source: Calculations by Bonnie Heudorfer, based on HUD's Picture of Subsidized Households, 2017 (number of units) and 5-year ACS, 2016 (poverty rate). UMDI mapping.

Map 6.6: Vouchers Used by Black Households, Against Poverty Level of Census Tract
Includes those administered by LHAs



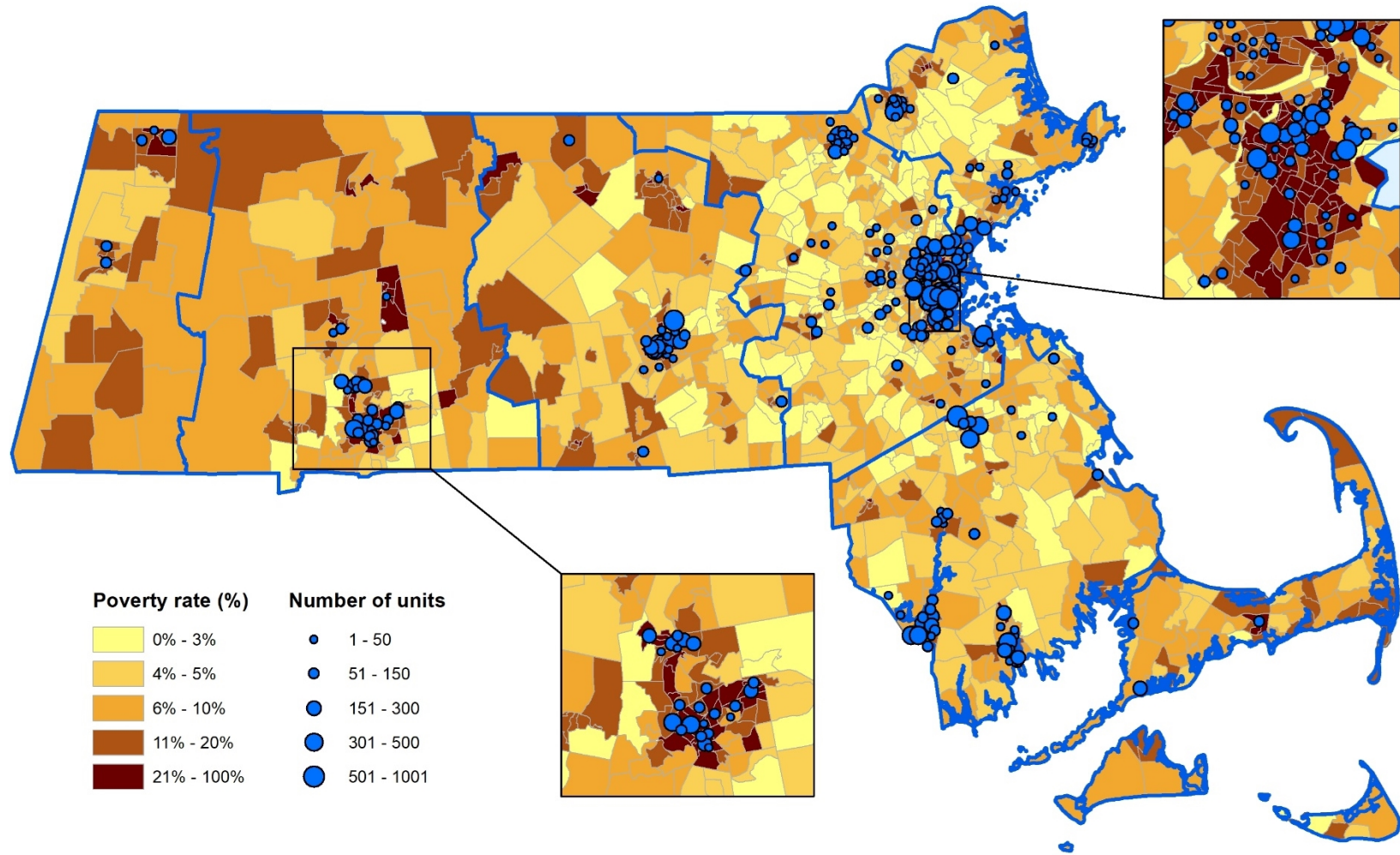
Source: Calculations by Bonnie Heudorfer, based on HUD's Picture of Subsidized Households, 2017 (number of units) and 5-year ACS, 2016 (poverty rate). UMDI mapping.

Map 6.7: Vouchers Used by Hispanic Households, Against Poverty Level of Census Tract
Includes those administered by LHAs



Source: Calculations by Bonnie Heudorfer, based on HUD's Picture of Subsidized Households, 2017 (number of units) and 5-year ACS, 2016 (poverty rate). UMDI mapping.

Map 6.8: Federal Public Housing, Against Poverty Level of Census Tract



Source: Calculations by Bonnie Heudorfer, based on HUD's Picture of Subsidized Households, 2017 (number of units) and 5-year ACS, 2016 (poverty rate). UMDI mapping.

Table 6.17: Housing Choice Voucher Utilization by Race by Location in High Poverty Areas

	Share of Population, Voucher Holders in High Poverty/VLI Census Tracts					Share of Voucher Holders in High Poverty/VLI Census Tracts v Share of Population			
	White *	Black *	Asian *	Hispanic	Total	White *	Black *	Asian *	Hispanic
% of total MA population living in concentrated high poverty census tracts (R/ECAPs and Maj White CAPs)	1.9%	15.6%	6.0%	16.5%	4.7%				
% of total MA population living in <i>racially/ethnically</i> concentrated high poverty census tracts (R/ECAPs)	1.0%	14.0%	3.9%	15.2%	3.6%				
% of total MA population living in majority White concentrated high poverty census tracts (White CAPs)	0.9%	1.5%	2.1%	1.3%	1.1%				
% of federal voucher holders living in high poverty census tracts	6.7%	16.8%	6.9%	23.8%	14.1%	3.53	1.08	1.15	1.44
% of federal voucher holders living in R/ECAPs	4.3%	14.7%	5.2%	22.6%	12.2%	4.30	1.05	1.33	1.49
% of federal voucher holders living in majority White CAPs	2.4%	2.0%	1.6%	1.3%	1.9%	2.67	1.33	0.76	1.00
% of federal voucher holders living in ELI/VLI census tracts	4.1%	31.8%	11.2%	36.9%	10.1%	2.17	2.04	1.87	2.24
% of federal voucher holders living in White minority ELI/VLI census tracts	2.4%	29.4%	10.3%	33.1%	8.1%	2.44	2.10	2.64	2.18
% of federal voucher holders living in majority White ELI/VLI census tracts	1.7%	2.4%	0.9%	3.9%	2.0%	1.86	1.60	0.44	2.97

Source: 2017 MA State Data Collection Reports and HUD's 2017 Picture of Subsidized Households, population and poverty data based on 2016 5-Year American Community Survey, Tables 17001-B-D-H-I. Includes population in households for whom poverty status was determined.

Public and Subsidized²³ Housing Offering Units with 3 (or More) Bedrooms

Ten Massachusetts cities account for over 62 percent of the assisted units with 3 or more bedrooms: Boston, Springfield, Worcester, New Bedford, Cambridge, Holyoke, Lowell, Lawrence, Fall River, and Brockton. They account for 48 percent of the assisted units with 0-2 bedrooms. In half of these cities, people of color predominate. Communities with no large units (those with 3 or more bedrooms) in their public or subsidized inventory do provide more than 4,000 smaller units, often specifically restricted to seniors or those with disabilities.

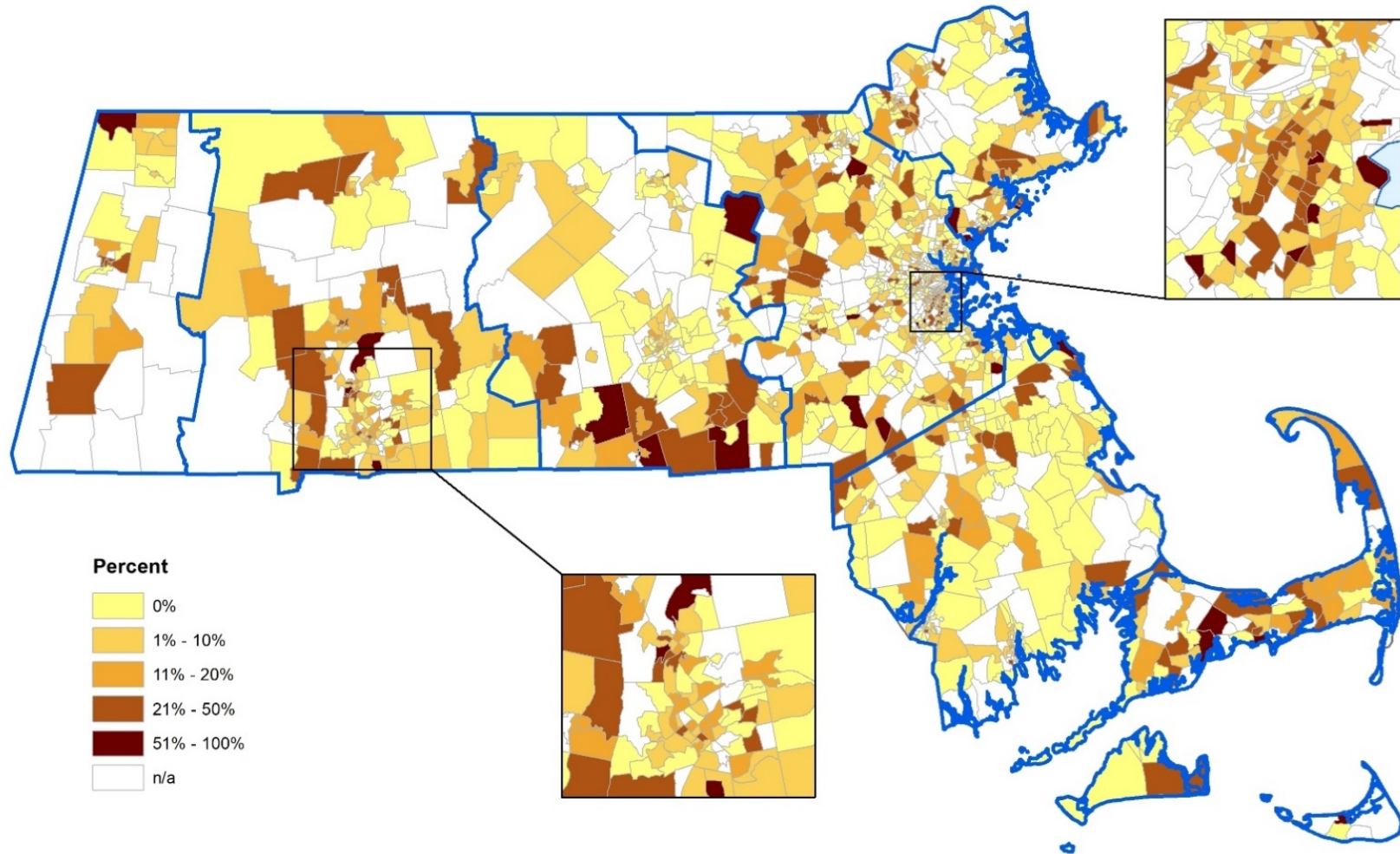
This concentration notwithstanding, nearly three quarters (260) of Massachusetts cities and towns include public or subsidized rental housing developments, and over three quarters of these include larger (3+ bedroom) units in their assisted inventory. This is a remarkable record, considering that more than 21 percent of the Commonwealth's municipalities have fewer than 3,000 residents – and half of these have fewer than 1,500 residents. The breadth of state's assisted housing network is the result of more than 50 years of policies and resources aimed expanding the supply and improving the distribution of affordable housing statewide. Massachusetts was the first state in the nation – and remains one of the few – with a mechanism (MGL Ch. 40B) providing a limited override of local zoning, if necessary, to create low-income housing. In the 1980s, when the state public housing resources were in high demand for the production of housing for seniors in suburban and rural towns, DHCD often conditioned approval on the community's willingness to include family housing or housing for those with disabilities.

Currently, sponsors who seek to build affordable senior housing are advised that DHCD will evaluate each community's prior support for affordable family housing before funding age-restricted units. Family housing production in neighborhoods and communities that provide access to opportunities, including, but not limited to, jobs, transportation, education, and public amenities is a priority category in the state's 2018-2019 Qualified Allocation Plan. DHCD requires that at least 65 percent of the units in a project must include two or more bedrooms, and at least 10 percent must be three-bedroom units, unless that percentage of two-bedroom or three-bedroom units is infeasible or unsupported by public demand.

Map 6.9 documents the percentage of each municipality's assisted housing developments – federal public housing as well as the state public housing and privately-owned subsidized units covered by the Massachusetts Data Collection Act – that include three or more bedrooms. The data are depicted on Map 6.5 and are summarized on **Table 6.18**.

²³ "It is important to note that Subsidized housing" in this context refers to state and federally funded housing, not housing that satisfies the broader definition of "subsidy" for purpose of the SHI and c. 40B.

Map 6.9: Three or More Bedroom Units as a Percent of Subsidized Housing
Includes only housing units covered by the MA Data Collection Act and Federal Public Housing



Source: DHCD's Data Collection for Government Assisted Housing in Massachusetts, 2017 and HUD's Picture of Subsidized Households, 2017

Table 6.18: Units with 3 or More Bedrooms as a Percent of Municipality's Public and Subsidized Rental Housing

Region	Number of Communities in Region	Number with Assisted Units	Total Number of Assisted Units (000s)	Number with 3 BR Units	Total Number of 3 BR Units in Assisted Developments (000s)
Berkshire	32	10	3.2	9	0.5
Cape & Islands	23	19	3.4	16	0.4
Central	60	47	13.6	30	2.0
Greater Boston	86	78	82.8	67	12.5
Northeast	34	29	17.8	24	2.2
Pioneer Valley	69	31	20.5	24	3.5
Southeast	47	46	18.8	28	2.3
MASSACHUSETTS	351	260	160.1	198	23.5

Source: Source: Source: 2017 MA State Data Collection Reports and HUD's 2017 Picture of Subsidized

Note: Unit totals shown here (in thousands) differ from those presented elsewhere in the AI. This analysis captures about 93 percent of state and federal public housing and privately-owned subsidized units reported in 2017. It is based on entries with complete geographic identifiers and bedroom count. A small number of units in census tracts that cover two or more municipalities were also excluded.