

Facsimile Transmittal

U. S. Department of Housing and Urban Development  
Office of Department Grants Management and Oversight

OMB Approval No. 2525-0118  
exp. Date (5/30/2008)

1214404977-4056

\* Name of Document Transmitting: Nothing faxed with this Application

1. Applicant Information:

\* Legal Name: Legal Assistance Corporation of Central Massachusetts  
\* Address:  
\* Street1: 405 Main Street  
Street2:  
\* City: Worcester  
County: Worcester  
\* State: MA: Massachusetts  
\* Zip Code: 01608 \* Country: USA: UNITED STATES

2. Catalog of Federal Domestic Assistance Number:

\* Organizational DUNS: [Redacted] CFDA No.: 14.408  
Title: Fair Housing Initiatives Program  
Program Component:

3. Facsimile Contact Information:

Department: Worcester Fair Housing Project  
Division:

4. Name and telephone number of person to be contacted on matters involving this facsimile.

Prefix: Mr. \* First Name: [Redacted]  
Middle Name: [Redacted]  
\* Last Name: [Redacted]  
Suffix:  
\* Phone Number: 508-752-3718  
Fax Number: 508-752-5918

\* 5. Email: [Redacted]

\* 6. What is your Transmittal? (Check one box per fax)

- a. Certification  b. Document  c. Match/Leverage Letter  d. Other

\* 7. How many pages (including cover) are being faxed? 1

Application for Federal Assistance SF-424

Version 02

\* 1. Type of Submission:

- Preapplication
- Application
- Changed/Corrected Application

\* 2. Type of Application:

- New
- Continuation
- Revision

\* If Revision, select appropriate letter(s):

[Redacted]

\* Other (Specify)

[Redacted]

\* 3. Date Received:

07/08/2008

4. Applicant Identifier:

[Redacted]

5a. Federal Entity Identifier:

[Redacted]

\* 5b. Federal Award Identifier:

[Redacted]

State Use Only:

6. Date Received by State:

[Redacted]

7. State Application Identifier:

[Redacted]

8. APPLICANT INFORMATION:

\* a. Legal Name:

Legal Assistance Corporation of Central Massachusetts

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

04-2446242

\* c. Organizational DUNS:

[Redacted]

d. Address:

\* Street1:

405 Main Street

Street2:

[Redacted]

\* City:

Worcester

County:

Worcester

\* State:

MA: Massachusetts

Province:

[Redacted]

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

01608

e. Organizational Unit:

Department Name:

Worcester Fair Housing Project

Division Name:

[Redacted]

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

\* First Name:

[Redacted]

Middle Name:

[Redacted]

\* Last Name:

[Redacted]

Suffix:

[Redacted]

Title:

Executive Director

Organizational Affiliation:

[Redacted]

\* Telephone Number:

508-752-3718

Fax Number:

508-752-5918

\* Email:

[Redacted]

**Application for Federal Assistance SF-424**

Version 02

**9. Type of Applicant 1: Select Applicant Type:**

M: Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education)

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

**\* 10. Name of Federal Agency:**

US Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.408

**CFDA Title:**

Fair Housing Initiatives Program

**\* 12. Funding Opportunity Number:**

FR-5200-N-11A

**\* Title:**

Fair Housing Initiative Program - PEI

**13. Competition Identification Number:**

FHIP-24-PEI

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Worcester County, Massachusetts

**\* 15. Descriptive Title of Applicant's Project:**

Worcester Fair Housing Project

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

Version 02

16. Congressional Districts Of:

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

\* a. Start Date:

\* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="232,000.00"/>
* b. Applicant	<input type="text" value="REDACTED"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="REDACTED"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="REDACTED"/>

\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)

Yes  No

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

**Application for Federal Assistance SF-424**

Version 02

**\* Applicant Federal Debt Delinquency Explanation**

The following field should contain an explanation if the Applicant organization is delinquent on any Federal Debt. Maximum number of characters that can be entered is 4,000. Try and avoid extra spaces and carriage returns to maximize the availability of space.

[Empty text input area for Applicant Federal Debt Delinquency Explanation]

**Applicant/Recipient  
Disclosure/Update Report**

U.S. Department of Housing  
and Urban Development

OMB Approval No. 2510-0011  
(exp. 08/31/2009)

Applicant/Recipient Information

\* Duns Number

[REDACTED]

\* Report Type:

INITIAL

1. Applicant/Recipient Name, Address, and Phone (include area code):

\* Applicant Name:

Legal Assistance Corporation of Central Massachusetts

\* Street1:

405 Main Street

Street2:

\* City:

Worcester

County:

Worcester

\* State:

MA: Massachusetts

\* Zip Code:

01608

\* Country:

USA: UNITED STATES

\* Phone:

508-752-3718

2. Social Security Number or Employer ID Number:

04-2446242

\* 3. HUD Program Name:

Fair Housing Initiatives Program

\* 4. Amount of HUD Assistance Requested/Received: \$

232,000.00

5. State the name and location (street address, City and State) of the project or activity:

\* Project Name:

Worcester Fair Housing Project

\* Street1:

405 Main Street

Street2:

\* City:

Worcester

County:

\* State:

MA: Massachusetts

\* Zip Code:

01608

\* Country:

USA: UNITED STATES

**Part I Threshold Determinations**

\* 1. Are you applying for assistance for a specific project or activity? These terms do not include formula grants, such as public housing operating subsidy or CDBG block grants. (For further information see 24 CFR Sec. 4.3).

Yes

No

\* 2. Have you received or do you expect to receive assistance within the jurisdiction of the Department (HUD), involving the project or activity in this application, in excess of \$200,000 during this fiscal year (Oct. 1-Sep. 30)? For further information, see 24 CFR Sec. 4.9

Yes

No

If you answered " No " to either question 1 or 2, **Stop!** You do not need to complete the remainder of this form.

**However,** you must sign the certification at the end of the report.

Form HUD-2880 (3/99)

**Part II Other Government Assistance Provided or Requested / Expected Sources and Use of Funds.**

Such assistance includes, but is not limited to, any grant, loan, subsidy, guarantee, insurance, payment, credit, or tax benefit.

Department/State/Local Agency Name:

\* Government Agency Name:

Government Agency Address:

\* Street1:

Street2:

\* City:

County:

\* State:

\* Zip Code:

\* Country:

\* Type of Assistance:

\* Amount Requested/Provided: \$

\* Expected Uses of the Funds:

Department/State/Local Agency Name:

\* Government Agency Name:

Government Agency Address:

\* Street1:

Street2:

\* City:

County:

\* State:

\* Zip Code:

\* Country:

\* Type of Assistance:

\* Amount Requested/Provided: \$

\* Expected Uses of the Funds:

(Note: Use Additional pages if necessary.)

Add Attachment

Delete Attachment

View Attachment

**Part III Interested Parties.** You must decide.

1. All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity and

2. Any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds \$50,000 or 10 percent of the assistance (whichever is lower).

* Alphabetical list of all persons with a reportable financial interest in the project or activity (For individuals, give the last name first)	* Social Security No. or Employee ID No.	* Type of Participation in Project/Activity	* Financial Interest in Project/Activity (\$ and %)
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %

(Note: Use Additional pages if necessary.)

Add Attachment

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View Attachment

**Certification**

**Warning:** If you knowingly make a false statement on this form, you may be subject to civil or criminal penalties under Section 1001 of Title 18 of the United States Code. In addition, any person who knowingly and materially violates any required disclosures of information, including intentional non-disclosure, is subject to civil money penalty not to exceed \$10,000 for each violation. I certify that this information is true and complete.

\* Signature:

\* Date: (mm/dd/yyyy)

## WORCESTER FAIR HOUSING PROJECT STATEMENT OF WORK

### I. Introduction

The Worcester Fair Housing Project's work plan consists of several activities, outlined below. Most of the activities will occur simultaneously throughout the year-long period of the grant, and therefore do not lend themselves to a strict chronological listing. A timeframe for all activities is provided herein.

### II. The Testing Program

#### A. Tester Recruitment

- The Program Manager will recruit and train 20 new testers throughout Worcester County by aggressive outreach, which will include posting informational flyers and invitations at social service agencies and faith-based congregations, and by placing advertisements in newspapers.
- Recruitment activities will start in the first month of the grant, and at least 10 testers will have been recruited and trained by the end of the second quarter of the grant. The remaining testers will be recruited and trained in the second half of the grant year.

#### B. Tester Training

- The Program Manager will conduct at least two four-hour tester trainings during the course of the grant period. The trainings will include education on fair housing laws, a screening of a video about testing, review of the Project's testing manual and forms, a role-playing exercise about objective observation, and practice tests.
- At least one training will occur by the end of the first half of the grant period, and the second training and any other trainings needed will occur in the second half of the grant period.
- A list of testers trained, along with training agendas, will be provided to HUD on a quarterly basis.

#### C. Performing Tests

- The Project will identify 30 test sites and will perform a total of 50 complaint-based and audit paired tests during the grant year, including 10 re-tests and 15 tests which show differential treatment. In addition, the Project will conduct 5 targeted investigations based on a mapping analysis of census data, past complaints of discrimination, and/or media reports about fair housing issues.
- The Program Manager will debrief 50 testers during the grant year and ensure that all testing forms are properly filled out and all testing procedures are followed.

- Testing will occur throughout the grant, in immediate response to complaints and systemic investigation needs. An enforcement log, chronicling all tests results, will be provided to HUD on a quarterly basis.

### III. Education and Outreach

The Project's staff, including employees of LACCM and the City of Worcester, will conduct education and outreach activities throughout Worcester County during the entirety of the grant, as described below.

#### A. Fair Housing Trainings

##### 1. Targeted Audiences

- Project staff will conduct at least five fair housing workshops addressing various aspects of fair housing law, including disability, reasonable accommodations and reasonable modifications in private housing; refusal to rent based on race and national origin; refusal to rent based on familial status and refusal to de-lead; and reasonable accommodations in the application, admission, and eviction processes in public and subsidized housing. The total number of people in attendance at these workshops will be at least 120. Two of these workshops will focus on race and national origin and at least 20 non-English speakers will attend these two workshops (one will be conducted in Spanish by the Project's Spanish-speaking intake worker and one will be conducted in Vietnamese by the Project's Vietnamese-speaking outreach worker). Three of these five workshops will occur during the first half of the grant period, and the remaining sessions will take place during the second half of the grant period. Training rosters and agendas will be provided to HUD on a quarterly basis.
- The Project will conduct four workshops in conjunction with the City of Worcester's NeighborWorks Homeownership Center to educate low- and moderate-income households about FHA products as reliable, safe alternatives for consumers facing foreclosure and for consumers seeking an affordable refinancing option. These workshops will also educate consumers about fair lending and discriminatory lending practices. Appropriate oral and sign interpreters and written translations shall be provided as necessary. The trainings will be conducted by Project attorneys and will reach at least 25 households. One workshop will occur in each quarter of the grant period. Training rosters and agendas will be provided to HUD on a quarterly basis.
- The Project will conduct 20 meetings with local groups throughout the grant period in order to introduce its work to the community. The Project will also establish 2 partnerships with local governments and 2 partnerships with local agencies or organizations (the local minority-serving institution and a grass roots faith-based organization), developing

protocols for referrals of cases to the Project. These partnerships will be established in the first half of the grant.

## 2. Staff Trainings

The Program Manager will, within the first quarter of the grant, conduct a training for the City of Worcester's Human Rights Commissioners on basic fair housing law and the protocols of the Project. The Program Manager, with the assistance of other LACCM attorneys on this Project, will also conduct a staff training for LACCM employees during the first quarter of the grant. A total of 40 people will be trained at these two sessions, and training rosters and agendas will be provided to HUD at the end of the first quarter.

## B. Production and Distribution of Written Materials

- LACCM will create 5,000 brochures and 100 posters in English, Spanish and Vietnamese about all classes protected under the Act.
- Upon approval by HUD, LACCM and the City of Worcester will distribute the brochures and posters at public places and at social service agencies throughout Worcester County. In addition, LACCM will continue distributing brochures and posters already approved by HUD under LACCM's prior PEI grant (No. FH700G05089) and current PEI grant (No. FH700G07055). The distribution of materials will reach at least 1000 non-English speakers.
- At least 2,000 brochures and 40 posters will be distributed by the end of the second quarter, and any remaining materials will be distributed by the end of the grant. Copies of the distributed materials, along with a distribution list, will be provided to HUD on a quarterly basis.

## C. Media and Other Outreach Activities

- Project staff, including LACCM employees and the City of Worcester, will publicize the Project through at least one appearance on Worcester's public access television channel in the first half of the grant, reaching a viewership of an estimated 55,000 people.
- Project staff will write at least one article about fair housing for an area newspaper reaching an estimated 10,000 people, to be published by the end of the third quarter. The Project will seek approval from HUD before publishing any article, and the Project will provide copies of any published materials to HUD on a quarterly basis.
- The City of Worcester's bi-lingual intake worker will conduct education and outreach activities to Latino and other communities throughout the City of Worcester starting in the first month of the grant. The Project's Vietnamese outreach paralegal will also conduct education and outreach activities to Worcester's Southeast Asian community starting in the first month of the grant. A list of education and outreach activities, including attendance rosters, will be provided to HUD on a quarterly basis.

- The Project will contact five media outlets about fair housing violations during the grant year.

#### IV. Intake, Investigation and Complaint Referral

##### A. Intake and Processing of Complaints

- The Project will take 120 complaints by persons who have experienced discrimination in their search for housing, their efforts to maintain their current housing, or their attempts to access affordable housing programs. Complaints will be fielded by LACCM staff at its main office in Worcester, and at satellite offices in Athol, Fitchburg, Milford and Southbridge. Complaint information will be provided to HUD on an enforcement log on a quarterly basis.
- Under the supervision of the City's Director of Human Rights, the City of Worcester's intake worker will interview victims of housing discrimination at designated intake sites throughout the City, and refer at least 25 complaints to LACCM for further investigation, pursuant to a referral protocol established by the Project. She will hold intake hours in at least three social service agencies, and in addition will schedule individual appointments at the Worcester Public Library. Intake activities will commence as soon as the grant starts. A log chronicling office hours held, listing the number of clients served, and containing client demographic information will be provided to HUD on a quarterly basis. Complaint information will also be included in the enforcement log, which will be provided to HUD quarterly.
- The City's Human Rights Commissioners, under the supervision of the City's Director of Human Rights, will do intake for victims starting in the first month of the grant, and will refer all appropriate complaints to LACCM for further investigation. A log listing the number of clients served and containing client demographic information will be provided to HUD on a quarterly basis. Complaint information will also be included in the enforcement log, which will be provided to HUD quarterly.

##### B. Enforcement Activities

The Project will conduct enforcement activities throughout the grant period in immediate response to meritorious complaints. All enforcement activities will be reported to HUD in an enforcement log updated on a quarterly basis.

Enforcement activities to be undertaken by the Project include:

- LACCM attorneys will fully assess the 120 complaints they receive for fair housing violations.
- At least 15 of the 120 complaints will be from persons who have been denied housing or otherwise discriminated against based on their disability, and LACCM attorneys will obtain reasonable modifications or accommodations for 10 persons.

- The Project will provide counseling in an estimated 20 matters arising from complaints by immigrants, and will provide appropriate interpretations and translations for those immigrants who have Limited English Proficiency.
- The Project will interview an estimated 20 witnesses, procure an estimated 2 expert witnesses, and conduct an estimated 20 property searches.
- LACCM attorneys will obtain favorable pre-filing closings for 20 persons.
- LACCM attorneys will litigate 15 cases and reach successful resolutions for 12 persons.
- LACCM attorneys will mediate 5 cases and reach successful resolution for another 4 persons.
- LACCM attorneys will also monitor settlement agreements for 5 persons.

## Narrative Budget Workplan

### 1. PERSONNEL

Personnel costs include the salaries of LACCM employees for time spent directly on project activities. Salaries are based on actual annual salaries plus projected increases over the next twelve months. These estimated rates are prorated for time spent on project activities. Accurate, after-the-fact time records are submitted by LACCM employees on a bi-weekly basis and are used to charge salaries & benefits to cost reimbursement awards. LACCM uses a basis of 35 hours per week (1,820 hours annually) to equal one full-time equivalency (FTE). Only actual salaries paid for actual time spent on project activities will be charged to the project.

Program Manager: [REDACTED] will devote 90% her time to the project. Her projected annual salary is \$60,500.

Total: [REDACTED] Federal Funds: \$35,371      Matching Funds: [REDACTED]

Managing Attorney: [REDACTED] will devote 5% of her time to this project. Her projected annual salary is \$90,000.

Total: [REDACTED] Federal Funds: \$3,006      Matching Funds: [REDACTED]

Executive Director: [REDACTED] will devote 5% of his time to this project. His projected annual salary rate is \$105,000.

Total: [REDACTED] Federal Funds: \$3,507      Matching Funds: [REDACTED]

Staff Attorneys: Three staff attorneys included in the project budget, Attorneys [REDACTED] will devote 100%, 20% and 10% of their time, respectively, to this project for a total FTE of 1.3. [REDACTED] projected annual salary is \$46,000, [REDACTED] projected annual salary is \$47,000 and [REDACTED] projected annual salary is also \$47,000.

Total: [REDACTED] Federal Funds: \$40,145      Matching Funds: [REDACTED]

Outreach Paralegal: [REDACTED] will devote 10% of an FTE, or 182 hours, to the project. His projected hourly wage is \$20.93 per hour.

Total: [REDACTED] Federal Funds: \$2,544      Matching Funds: [REDACTED]

Program Secretary: [REDACTED] will devote 40% of her time, or 728 hours, to the project. Her projected hourly wage is \$20.87 per hour.

Total: [REDACTED] Federal Funds: \$10,149      Matching Funds: [REDACTED]

### TOTAL PERSONNEL

Total: [REDACTED] Federal Funds: \$94,722      Matching Funds: [REDACTED]

**2. FRINGE BENEFITS**

Fringe benefits are calculated at 24.19% percent of salary. Fringe benefits include payroll taxes (social security, Medicare, Massachusetts Health and Federal Unemployment), health, dental and vision insurance, life insurance, long-term disability and worker's compensation insurance and an employer 401(k) contributions equal to 5% of gross salary. At the end of each fiscal year, LACCM calculates the actual total cost of fringe benefits to total salaries. The fringe benefit rate included in our most recently approved indirect cost proposal is 24.19% and is therefore used in this proposed budget. The total project salary base of \$143,296 yields fringe benefits equal to \$34,663.

**TOTAL FRINGE BENEFITS**

**Total:** [REDACTED]      **Federal Funds:** \$22,913      **Matching Funds:** \$ [REDACTED]

**3. TRAVEL**

Travel includes mileage at the IRS rate of 58.5 cents per mile according to LACCM's travel policy for the use of privately-owned vehicles for project-related travel. It is anticipated that project employees and testers will be reimbursed for a total of 4,000 miles using matching funds.

Travel also includes the required \$7,000 allowance for required HUD-sponsored mandatory or approved training to be paid using HUD funds. Although locations for HUD-required trainings are unknown at this time, the current Washington D.C. *per diem* and other related travel costs have been used in this budget as an example. LACCM travel policies use *per diems* established by the General Services Administration as maximum reimbursement to employees.

**TOTAL TRAVEL**

**Total:** [REDACTED]      **Federal Funds:** \$7,000      **Matching Funds:** [REDACTED]

**4. CONTRACTS & SUB-GRANTEES**

The Worcester Fair Housing Project is a partnership between LACCM and the City of Worcester Human Rights Office. Thus, the City of Worcester will be a sub-grantee under the project. Both parties, agreeing to the responsibilities and goals consistent with the project, will sign a formal written memorandum of understanding. A letter of commitment from the City of Worcester is included with this application.

This budget includes:

- 80% of the Intake Worker's time
- 15% of the time of the Director of the City of Worcester Human Rights Office (The City of Worcester uses a 40-hour basis per work week. Thus, 1 FTE = 40 hrs. X 52 weeks = 2,080 hrs.)

**TOTAL CONTRACTS & SUB-GRANTEES**

**Total: \$48,325      Federal Funds: \$35,929      City Match:      \$12,396**

**5.      OTHER DIRECT COSTS**

This budget category includes money for Honorariums for 20 testers once they complete tester training and for completion of 50 paired tests (100 payments). These payments are nominal and are only meant to provide encouragement for tester participation in the project.

This budget category also includes translation and reproduction of 100 posters and 5,000 brochures. This material will be handed out and displayed at multiple citywide locations and distributed at workshops.

**TOTAL OTHER DIRECT COSTS**

**Total: \$4,575      Federal Funds: \$3,056      Matching Funds: [REDACTED]**

**6.      INDIRECT COSTS**

Legal Assistance Corporation of Central Massachusetts has an approved indirect cost rate of 44.79% of total modified direct costs with the U.S. Department of Justice. The indirect cost base includes direct costs but only the first \$25,000 of sub-recipient costs.

Calculation of base:

$$\text{Total Direct Costs} = \$240,199 - \$48,325 + \$25,000 = \$216,874$$

$$\$216,874 \times 44.79 = \$97,138$$

**TOTAL INDIRECT COSTS**

**Total: \$ 97,138      Federal Funds: \$68,380      Matching Funds: [REDACTED]**

### Budget Summary

	<u>Total</u>	<u>Federal Funds</u>	<u>Matching Funds</u>
Personnel	[REDACTED]	94,722	[REDACTED]
Fringe Benefits	[REDACTED]	22,913	[REDACTED]
Travel	[REDACTED]	7,000	[REDACTED]
Sub-grantee	[REDACTED]	35,929	[REDACTED]
Other Direct Costs	[REDACTED]	3,056	[REDACTED]
Indirect Costs	[REDACTED]	68,380	[REDACTED]
<b>Total</b>	[REDACTED]	<b>\$232,000</b>	[REDACTED]

### Funding Summary

HUD	\$232,000
Mass. Legal Assistance Corp.	[REDACTED]
City of Worcester	<u>12,396</u>
	[REDACTED]

## **ADDITIONAL BUDGET INFORMATION**

### Cost Effectiveness of the Program

The proposed program is cost-effective due to the experience and location of the partners, the amount of leveraged funds and the average hourly rate of the proposed program. First, LACCM advocates bring a wealth of knowledge and expertise to the work; two of the attorneys assigned to the program have substantial experience in litigating fair housing cases. Similarly, the City's Human Rights Director brings many years of experience in civil rights work to the program. Second, the organization is based in the target area itself; the main office of the Legal Assistance Corporation of Central Massachusetts and the City of Worcester's Human Rights Office are in Worcester, the county seat for the targeted service area. Third, the program leverages significant funds from sources other than HUD, including financial commitments from the City of Worcester and from the Massachusetts Legal Assistance Corporation. These leveraged funds, in the amount [REDACTED] equal over forty-five cents for each dollar requested from HUD yet are not required for the PEI general component. And finally, the total program proposes 7,076 hours of personnel time at a modest and cost-effective rate of just \$47.68 per hour including all direct and indirect costs. Of this amount, HUD would fund \$32.79 per hour for the project (i.e., \$232,000 /7,076 hours).

### Financial Management Capacity

LACCM maintains appropriate internal controls as evidenced by the management letter and unqualified audit opinion for fiscal year 2007 (copy available upon request). In addition to an annual financial audit, and, when appropriate, an A-133 compliance audit, all levels of LACCM are involved in the implementation of LACCM's strong internal controls. The Board of Directors takes an active role in the financial management of the organization as evidenced by LACCM's internal policy that all non-routine checks equal to or exceeding \$5,000 are

countersigned by a member of the Board in addition to the Executive Director. Financial Statements are issued monthly and periodically submitted to the Board for review no less than five times per year. The Executive Director reviews and approves all cash disbursements ensuring expenditures are within board-approved budgets and, when required, have received prior approval from the appropriate funding agency. The Fiscal Manager manages all aspects of accounting and performs the day-to-day accounting transactions including payroll, accounts payable, cash receipts and general ledger entries. To ensure separation of duties an external CPA periodically reviews selected financial transactions and produces monthly financial statements. Also, the receptionist maintains a separate cash receipts log. These and many other internal controls contribute to LACCM's strong financial position.

LACCM is currently implementing, as the prime recipient, one grant from the U.S. Department of Housing and Urban Development (grant #FH700G07055) and one grant from the U.S. Department of Justice (grant #2005-WL-AX-0032). In the last four years, LACCM successfully managed and implemented, as the prime recipient, four federal grants; the first from U.S. Department of Housing and Urban Development (grant #FH700G05089), the second and third from the U.S. Department of Justice (grant # 2001WLBX0028 and grant # 2006-MI-CS-0006), and the fourth from the U.S. Department of Commerce (grant # 25-60-I01034). All of the grants discussed above include sub-recipient organizations. LACCM and each sub-recipient have written agreements which stipulate each party's responsibilities under each award. LACCM monitors the compliance of these sub-recipients to ensure the achievement of program goals. In 2001 LACCM developed an indirect cost policy statement and has applied for and received an approved indirect cost rate from the U.S. Department of Commerce and most recently the U.S. Department of Justice (LACCM's new Cognizant Federal Agency.)

## PROJECT ABSTRACT OUTLINING PROJECT ACTIVITIES

The Worcester Fair Housing Project is a partnership between the Legal Assistance Corporation of Central Massachusetts (“LACCM”) and the City of Worcester, one of New England’s largest cities. The Project will perform fair housing investigation and enforcement activities throughout central Massachusetts, where no other fair housing program is based. LACCM is not applying for any other grant under this NOFA.

With the requested funding, Project staff, including a Vietnamese-speaking outreach worker and a Spanish-speaking intake worker, will engage in outreach activities and investigate complaints made by victims of housing discrimination, including LEP persons and other special populations. The Project will run a comprehensive testing program, recruiting and training testers and conducting complaint-based and audit tests. Project attorneys will litigate meritorious cases in administrative forums and in state and federal court. In addition to obtaining monetary damages for clients, the Project will obtain extensive injunctive relief in appropriate cases and monitor compliance with settlement agreements.

As part of its effort to deter unlawful behavior and reach victims of discrimination, Project staff will create, translate, and distribute fair housing materials throughout the county. Project staff will give workshops to targeted groups of vulnerable populations, including the chronically homeless, the elderly and the disabled, and to consumers seeking information about FHA products and unfair lending practices. The Project will work with a local grass-roots faith-based community organization and with the local minority-serving institution to recruit testers, reach victims of discrimination, and educate consumers and housing providers about fair housing law.



**Legal Assistance Corporation**  
of Central Massachusetts

████████████████████  
EXECUTIVE DIRECTOR  
████████████████████

## **LEGAL ASSISTANCE CORPORATION OF CENTRAL MASSACHUSETTS**

### CODE OF CONDUCT POLICY

No employees, officers or agents of LACCM shall participate in the selection, award, or administration of a contract supported by LACCM funds, regardless of their source, if a real or apparent conflict of interest is involved. Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs any of the parties indicated herein, has a financial or other interest in the entity selected for an award. LACCM officers, employees, and agents shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subagreements. Unsolicited, nominal gifts (not cash) worth no more than \$20 may be accepted. Disciplinary action for infractions of this code of conduct will be referred to the Executive Director.

MICHAEL V. O'BRIEN  
CITY MANAGER



CITY OF WORCESTER

July 1, 2008

[REDACTED]  
Executive Director  
Legal Assistance Corp. of Central Mass.  
405 Main St.  
Worcester, MA 01608

**Re: Worcester Fair Housing Project**

Dear Attorney [REDACTED]

The City of Worcester is pleased to confirm the commitment of matching funds to support fair housing enforcement activities that will be carried out by the Worcester Fair Housing Project as outlined in the application of the Legal Assistance Corporation of Central Massachusetts (LACCM) for a U.S. Department of Housing and Urban Development FHIP/PEI General Component grant. I have the authority to commit matching funds in the amount of \$12,396 to LACCM for the activities outlined in LACCM's Statement of Work, including but not limited to activities related to investigation, testing, enforcement, outreach and training. The timeline for this commitment of funds will be consistent with the corresponding grant period. The City of Worcester does not have any affiliation with LACCM except that it is the subgrantee under LACCM's current PEI grant, No. FH700G07055.

The amount leveraged in support of these project activities is \$12,396 which is supported by tax-levy funds.

The match will be for direct expenses incurred by the Office of Human Rights. These expenses consist of 15% of the salary and related benefits of the Director of the Office of Human Rights.

On behalf of my administration, I am pleased to commit these funds to support LACCM's proposed fair housing enforcement project.

Sincerely,

  
Michael V. O'Brien  
City Manager

## BACK-UP TO FORM HUD-27300

1. City of Worcester Community Development Plan Housing Policy (11/04)  
[EONS@ci.worcester.ma.us](mailto:EONS@ci.worcester.ma.us)  
Scott Hayman, Director of Housing, 508-799-1400
2. City of Worcester Community Development Plan Housing Policy (11/04)  
Pages 1-22.  
[EONS@ci.worcester.ma.us](mailto:EONS@ci.worcester.ma.us)  
Scott Hayman, Director of Housing, 508-799-1400
3. City of Worcester Community Development Plan Housing Policy (11/04)  
Pages 6, 13-19.  
[EONS@ci.worcester.ma.us](mailto:EONS@ci.worcester.ma.us)  
Scott Hayman, Director of Housing, 508-799-1400

And

- City of Worcester Zoning Ordinance (2/91, as amended through 5/08)  
Article IV, Section 2  
[Planning@ci.worcester.ma.us](mailto:Planning@ci.worcester.ma.us)  
Joel Fontane, Director of Regulatory Services, 508-799-1400, x235
4. City of Worcester Zoning Ordinance (2/91, as amended through 5/08)  
Article IV  
[Planning@ci.worcester.ma.us](mailto:Planning@ci.worcester.ma.us)  
Joel Fontane, Director of Regulatory Services, 508-799-1400, x235
5. Worcester does not have impact fees.  
[Planning@ci.worcester.ma.us](mailto:Planning@ci.worcester.ma.us)  
Joel Fontane, Director of Regulatory Services, 508-799-1400, x235
9. International Code Council (ICC)  
[Code@ci.worcester.ma.us](mailto:Code@ci.worcester.ma.us)  
Joseph Mikielian, Zoning, 508-799-8534
10. City of Worcester Zoning Ordinance (2/91, as amended through 5/08)  
Article IV, Section 2  
[Planning@ci.worcester.ma.us](mailto:Planning@ci.worcester.ma.us)  
Joel Fontane, Director of Regulatory Services, 508-799-1400, x235
11. Worcester City Council – Housing Committee  
[Council@ci.worcester.ma.us](mailto:Council@ci.worcester.ma.us)  
Andrea Glass, Liaison, 508-799-1049

14. City of Worcester Zoning Ordinance (2/91, as amended through 5/08)  
Article VII  
[Planning@ci.worcester.ma.us](mailto:Planning@ci.worcester.ma.us)  
Joel Fontane, Director of Regulatory Services, 508-799-1400, x235
  
17. City of Worcester Zoning Ordinance (2/91, as amended through 5/08)  
Article II, Section 7  
[Planning@ci.worcester.ma.us](mailto:Planning@ci.worcester.ma.us)  
Joel Fontane, Director of Regulatory Services, 508-799-1400, x235

**Factor 2:  
Need/Distress/Extent of the Problem**

Documentation of Need

1. The urgency of the need

a. Potential consequences to persons if application is not funded

Worcester County, in central Massachusetts, runs from New Hampshire in the north to Rhode Island and Connecticut in the south and, according to the 2000 census, has a population of 752,757 persons. Legal Assistance Corporation of Central Mass. (“LACCM”) has its main office in the county’s largest city, Worcester, which, according to the 2000 census, has a population of 172,648 people. LACCM also staffs satellite offices in four locations in the county for consumers who live in the outlying areas of the region. The Worcester Fair Housing Project (“WFHP” or “the Project”) will serve all persons in Worcester County protected by federal and state fair housing laws. The Project will target special populations, including low- and moderate-income persons, residents of homeless shelters, persons with disabilities, the elderly, minorities, and persons with limited English proficiency (“LEP”). For LEP persons, the Project will ensure that interpreters and translators are available for both oral and written services.

There is no other program solely focused on housing discrimination based in Worcester County. Without the requested HUD funding, residents of the county will not effectively learn about and enforce their rights to be free from housing discrimination. In the absence of the extensive and multi-faceted program envisioned in this grant application, victims of housing discrimination will often not know that they have been treated illegally, or will not vindicate their rights. The Massachusetts Department of Housing and Community Development, in its 2007 Analysis of Impediments to Fair

Housing Access, suggests that many housing discrimination complaints may not be filed due to factors such as perceived futility, fear of retaliation, the subtlety of many discriminatory practices, and insufficient awareness about what constitutes housing discrimination and the availability of advocacy and testing services.<sup>1</sup> If funded, the WFHP will enable people to enforce the promise of the Fair Housing Act, which is that all people should have the chance to live where they choose.

b. Extent to which other organizations provide the services identified

LACCM is the only program based in and exclusively serving all of Worcester County that has expertise in and devotes considerable resources to investigating and enforcing fair housing laws. The Massachusetts Fair Housing Center, based in the western Massachusetts city of Holyoke, at times attempts to provide services outside of its western Massachusetts base. However, with only two attorneys on its entire staff, the extent and effectiveness of its services in Worcester County is markedly limited, especially in light of the varied language needs in the county.

2. Link between need and proposed activities

a. How the proposed activities fill gaps by, augment, or improve upon ongoing fair housing efforts and why the requested funding is necessary

As noted above, LACCM is the only program based in Worcester County that has expertise in and devotes considerable resources to investigating and enforcing fair housing laws. LACCM has a unique partnership with the City of Worcester, which significantly bolsters the Project's reach and effectiveness. Other organizations such as the Mass. Fair Housing Center, based in the western Massachusetts city of Holyoke, and

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<sup>1</sup>Page 97 of the Analysis, at <http://www.mass.gov/Ehed/docs/dhcd/hd/fair/08.pdf>.

the Mass. Commission Against Discrimination (“MCAD”), the state agency charged with enforcing the Commonwealth’s anti-discrimination laws, have a very limited presence in central Massachusetts. The county’s social service agencies and faith-based grass-roots organization do not specialize in fair housing issues, nor do they have testing or enforcement programs. In short, there are no other significant ongoing local efforts to address housing discrimination in Worcester County. Funding from HUD will enable LACCM to continue and expand its fair housing work in central Massachusetts.

b. Presence and evidence of housing discrimination within the Project area

In Worcester, the largest city in the county, and in other towns and cities throughout the county, neighborhoods are segregated by race and ethnicity. An analysis conducted by the MCAD in August 2003 showed that there were large concentrations of African-Americans, Asians, and Latinos in certain census blocks in Worcester, Leominster and Fitchburg.<sup>2</sup> In its analysis of the 2000 census, the Mumford Center at the University of Albany prepared dissimilarity indices showing that African-American, Asians, Latino, and White households in Worcester live in neighborhoods that are segregated from each other and that are divided more by race and ethnicity than by income differences.<sup>3</sup> In its Consolidated Plan covering July 1, 2000 through June 30, 2005, the City of Worcester submitted reports to HUD showing that there had been significant growth in racial and ethnic minority populations within the City of Worcester

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<sup>2</sup> The MCAD’s report, *Towards an Integrated Approach to Fair Housing Enforcement*, is available at <http://www.mass.gov/mcad/documents/2003fairhousinggrantmerged.pdf>.

<sup>3</sup> The Mumford Center’s analysis of the 2000 census is at <http://mumford1.dyndns.org/cen2000>. The Worcester data are analyzed at <http://mumford1.dyndns.org/cen2000/segregation/SegIncNatPages/9240msaSegInc.htm>.

since 1980,<sup>4</sup> and acknowledging that minority populations, particularly Hispanics and Blacks, still tend to be most heavily concentrated in the older, urban-core neighborhoods, where housing is substandard; the Plan's Analysis of Impediments to Fair Housing Choice ("AI") noted that many local leaders had called for a more regional effort to provide affordable housing so that low-income families would not continue to be concentrated in the central city.<sup>5</sup> In its Consolidated Submission for Community Planning and Development covering July 1, 2005 through June 30, 2010, the City acknowledged that "minority populations continue to live in housing with more problems, and that is of less value compared to their White counterparts. Blacks, for instance, paid significantly higher median rents in both 1990 and 2000, while they lived in housing that was of lower than the median value."<sup>6</sup>

According to the Housing Discrimination Study 2000 (HDS2000) sponsored by HUD and conducted by the Urban Institute, "Hispanics and African Americans most often encounter discrimination when they inquire about renting a housing unit. Too often, minorities are told that the unit is unavailable – while a non-Hispanic white tester would be able to examine or rent the property."<sup>7</sup> These results comport with what LACCM has seen over time as it represents victims of housing discrimination throughout the county. Since 2005, LACCM has received over 100 complaints about housing discrimination

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<sup>4</sup> According to the 2000 census, Worcester has a population of 172,648. Of those persons, 70.7% are Non-Hispanic White alone; 6.4% are Non-Hispanic Black alone; 4.5% are Non-Hispanic Asian alone; and 15.3% are Hispanic/Latino (of any race).

<sup>5</sup> 5-year Plan, Chapter II, pp. 6 and 17. A hard copy of the Plan is available through the City Manager's Executive Office of Economic and Neighborhood Development, Division of Neighborhoods and Housing Development, whose website is at <http://ci.worcester.ma.us/ocm/neighborhood/home.html>.

<sup>6</sup> 3-5 Year Strategic Plan, p. 10. A hard copy of the Plan is available through the City Manager's Executive Office of Economic and Neighborhood Development, Division of Neighborhoods and Housing Development, whose website is at <http://ci.worcester.ma.us/ocm/neighborhood/home.html>.

<sup>7</sup> HDS2000, [http://www.urban.org/UploadedPDF/410821\\_Phase1\\_Report.pdf](http://www.urban.org/UploadedPDF/410821_Phase1_Report.pdf), page 4. HDS2000 also found that the level of consistent adverse treatment against Asian and Pacific Islander renters is 21.5

each year from Worcester County residents. In the period between January 1 and June 30, 2008, LACCM received 76 such complaints; if that trend continues, over 150 victims of housing discrimination will have sought LACCM's assistance in 2008.

Discrimination in housing is an insidious and persistent barrier to equal housing opportunity. Studies show the continued difficulties endured by several special populations of disadvantaged people:

- Low- and Moderate-Income Families and Individuals

Housing affordability is a pervasive problem for low- and moderate-income families and individuals. According to Harvard's *The State of the Nation's Housing 2007*, "the pressures of high housing costs are moving up the income scale. . . . [H]ouseholds with a single minimum-wage worker will still be unable to afford even a modest two-bedroom rental apartment at today's rents anywhere in the country."<sup>8</sup> On the local level, in its 2005-2010 Consolidated Submission the City of Worcester stated: "The continual tightening of the housing market since the late 1990's and the decline in the numbers of persons able to afford to buy or rent homes, coupled with state and federal cutbacks for housing continues to push more families and individuals to the edge of homelessness."<sup>9</sup>

Low-income families with children are at high risk of becoming victims of fair housing violations. Discrimination against families with children takes several forms. Often, landlords refuse to de-lead their rental units and simultaneously refuse to rent to

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percent—about the same as the level for African American and Hispanic renters. The HDS2000 report did not specifically examine the target area for the Worcester Fair Housing Project.

<sup>8</sup> Page 3 of the report, which is available at [www.jchs.harvard.edu/publications/markets/son2007](http://www.jchs.harvard.edu/publications/markets/son2007).

<sup>9</sup> 3-5 Year Strategic Plan, p. 26. A hard copy of the Plan is available through the City Manager's Executive Office of Economic and Neighborhood Development, Division of Neighborhoods and Housing Development, whose website is at <http://ci.worcester.ma.us/ocm/neighborhood/home.html>.

parents of young children because of the presence of lead.<sup>10</sup> This is a particular problem in Worcester, which has an older housing stock containing lead paint;<sup>11</sup> indeed, Worcester's AI recommends that the city continue to de-lead housing units so that families with young children can find affordable housing.<sup>12</sup> In other cases, landlords tell applicants that they do not want children living in the premises, or landlords refuse to rent to families based on the number of people in the household. Many consumers do not even know that they have experienced discrimination when faced with such refusals.

The issue of housing discrimination against recipients of rental assistance, which almost always implicates familial status and is also a separate protected class under state law,<sup>13</sup> is of particular concern in the county. According to the City of Worcester's 2005-1010 Consolidated Submission, "Worcester's rental market has tightened significantly over the past few years. . . . An estimated 50% of all Worcester renter households cannot afford the average two-bedroom apartment. . . ."<sup>14</sup> Unless they are able to obtain and use rent subsidies, many tenants cannot afford to rent an apartment in the private market.

The Project will engage in outreach to and enforcement for families with children, so as to enable them to move into the housing of their choice and maintain its affordability; this work will further the goal, identified in Worcester's AI, of engaging in a regional effort around affordable housing so that low-income families are not

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<sup>10</sup> This is a violation of both federal law, which prohibits discrimination based on familial status, and state law, under which a refusal to rent or sell a dwelling unit to families with children because of the presence of lead constitutes illegal housing discrimination. See Mass. Gen. Laws c. 111, §199A.

<sup>11</sup> See Massachusetts Department of Public Health, Childhood Lead Poisoning Prevention Program, "*High Risk Communities for Childhood Lead Poisoning*," at [http://www.mass.gov/Eeohhs2/docs/dph/environmental/lead/highrisk\\_community\\_fy06.pdf](http://www.mass.gov/Eeohhs2/docs/dph/environmental/lead/highrisk_community_fy06.pdf).

<sup>12</sup> 5-year Plan, Chapter II, p. 17. A hard copy of the Plan is available through the City Manager's Executive Office of Economic and Neighborhood Development, Division of Neighborhoods and Housing Development, whose website is at <http://ci.worcester.ma.us/ocm/neighborhood/home.html>.

<sup>13</sup> See Mass. Gen. Laws c. 151B, §4(10).

concentrated in the central city. The Project will also train housing authorities and other providers so as to enable them to identify and avert illegal behavior.

The City of Fitchburg is the largest urban center in the northern part of Worcester County, with a population of 39,102, according to the 2000 census. Of those persons, 74.7% are Non-Hispanic White alone; 2.8% are Non-Hispanic Black alone; 4.4% are Non-Hispanic Asian alone; and 14.8% are Hispanic/Latino (of any race). Fitchburg's most recent AI noted that fair housing concerns raised during the preparation of the report involved discrimination against people of color, homeless people, families with children, and recipients of housing subsidies. The report concluded that "there is a perception that there is a lack of information about fair housing, especially related to the Housing Choice Voucher Program (formerly the Section 8 Certificate Program) currently available in the City." The report recommended that the City improve housing choice by conducting educational forums about fair housing and other issues for landlords and the general public.<sup>15</sup> The Project will offer its services to the City of Fitchburg to train both housing consumers and providers, thereby helping the City comply with the recommendations made in its Analysis of Impediments.

The Project will also work with residents living in the southern part of Worcester County, particularly the towns of Milford (whose population is 90.9% non-Hispanic White and 4.5% Hispanic) and Southbridge (whose population is 75.7% non-Hispanic White and 20.7% Hispanic). According to the 2000 census, Hispanic residents are not

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<sup>14</sup> 3-5 Year Strategic Plan, p. 13. A hard copy of the Plan is available through the City Manager's Executive Office of Economic and Neighborhood Development, Division of Neighborhoods and Housing Development, whose website is at <http://ci.worcester.ma.us/ocm/neighborhood/home.html>.

<sup>15</sup> A hard copy of Fitchburg's Analysis of Impediments is available through the City's Office of the Planning Coordinator. The City's website is at <http://ci.fitchburg.ma.us>.

evenly distributed among the census tracts that comprise the towns and are more heavily concentrated in certain census tracts in each of the towns.

- Persons with disabilities

People with disabilities face unique difficulties in finding and keeping good housing. Discrimination against the disabled is widespread, posing a barrier to finding a home. A report published by the Bazelon Center for Mental Health Law notes that “[a]mong all people in the country with ‘worst case housing needs,’ people with disabilities are recognized as having the greatest needs.”<sup>16</sup> A recent HUD report showed that people with disabilities encountered significant levels of adverse treatment when they search for rental housing. The study also revealed that people with disabilities are frequently denied requests for reasonable modifications and accommodations.<sup>17</sup>

Even after a person with disabilities is lucky enough to get into the housing of his or her choice, lack of knowledge about the requirements regarding reasonable accommodation puts many disabled people at risk of losing their homes, as they do not know that they can adjust rent-payment schedules or delay evictions in order to get help. Moreover, the existence of physical barriers, such as the lack of a ramp, prevents people with disabilities from fully enjoying the apartments they are able to rent. The Project staff has extensive expertise defending disabled tenants in eviction cases, in bringing affirmative cases under fair housing laws, and in asserting the legal rights of the disabled to reasonable accommodations and modifications. The Project will work with

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<sup>16</sup> *Increasing the Usability of Housing Choice Vouchers for People with Disabilities*, available at <http://www.bazelon.org/pdf/HousingFactsheet14.pdf>, citing a HUD report from March 2000, *Rental Housing Assistance--The Worsening Crisis*, available at

<http://www.huduser.org/Publications/AFFHSG/WORSTCASE00/worstcase00.pdf>.

<sup>17</sup> *Discrimination Against Persons with Disabilities: Barriers at Every Step*, prepared by the Urban Institute, May 2005, at [http://www.huduser.org/Publications/pdf/DDS\\_Barriers.pdf](http://www.huduser.org/Publications/pdf/DDS_Barriers.pdf).

independent living centers, housing providers, and social service agencies to do fair housing outreach and enforcement for the disabled residents of Worcester County.

- The elderly

Elderly residents of Worcester County are subject to particular pressures and stresses as they try to keep body and soul together. In the report *Addenda to Benchmarking Worcester's Future—Elder Services*, the particular needs of the elders of the City were noted. According to the report:

With one of the state's largest current per capita elder population as well as an aging baby boomer generation, Worcester will see demands for public and privately supported elder services such as assisted living, affordable health care, and social and recreational systems increase. . . . Collectively [elder service providers] must be prepared to ensure that elders receive appropriate residential, financial, social, medical, and health care services.<sup>18</sup>

According to Harvard's *The State of the Nation's Housing 2004*,<sup>19</sup> the elderly face a "quadruple threat. First, with lower average incomes, many elderly have inadequate incomes to pay all their housing costs. Second, with most living on fixed incomes, growing housing and other expenditures continue to erode their ability to make ends meet. Third, most age in place in single-family homes, making upkeep and the provision of care more difficult. Finally, any cognitive or physical limitations that must be addressed through in-home care or structural modifications further add to housing costs."

The *State of the Nation's Housing 2007* study reports that in 2005, households in the bottom quarter of the income distribution accounted for 78 percent of the severely housing cost-burdened and one fifth of these households are elderly.<sup>20</sup> The Project will

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<sup>18</sup> Page 19 of the report. A hard copy of the report is available through the Elder Affairs Division of the City of Worcester's Department of Health and Human Services, whose website is at <http://www.ci.worcester.ma.us/hhs>.

<sup>19</sup> The report is available at [www.jchs.harvard.edu/publications/markets/son2004](http://www.jchs.harvard.edu/publications/markets/son2004).

<sup>20</sup> The report is available at <http://www.jchs.harvard.edu/publications/markets/son2007/son2007.pdf>.

draw on LACCM's strong relationships with the county's Agency on Aging, elder service agencies and homecare providers to reach this vulnerable population, and will target enforcement to the special circumstances of elders in the community, with an emphasis on disability and reasonable accommodation issues. The Project will utilize the skills of LACCM's bi-lingual outreach paralegal who will work with the elderly Vietnamese community in Worcester on fair housing issues.

- The homeless

Homeless individuals and families face many challenges trying to find permanent housing, among them discrimination based on familial status, disability, race, and ethnicity. The homeless population in Worcester County is comprised of both unaccompanied adults, some of whom have disabilities, and families with children. According to Worcester's 2005-2010 Consolidated Submission, "Homelessness in Worcester emerged as a major social problem over the last 40 years. . . . Most recently, homelessness has been exacerbated by the shortage of affordable housing and reductions in core human service programs funded by the State, especially substance abuse detoxification services."<sup>21</sup> Worcester's largest shelter for unaccompanied adults and its family shelters are consistently filled. Building on LACCM's unique homeless outreach program (the Honorable Harry Zarrow Homeless Advocacy Project), which stations attorneys to do intakes in shelters throughout the county, the Project will educate homeless shelter residents about their rights under the Act and will test and litigate cases as appropriate if residents have been discriminated against in their housing search.

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<sup>21</sup> 3-5 Year Strategic Plan, p. 21. A hard copy of the Plan is available through the City Manager's Executive Office of Economic and Neighborhood Development, Division of Neighborhoods and Housing Development, whose website is at <http://ci.worcester.ma.us/ocm/neighborhood/home.html>.

Applicant Name: **Greene Corporation of Central Massachusetts**  
 Project Name: **Greene Fair Housing Project**  
 Project Type: **Construction**  
 Construction Type: **Construction**

Fair Housing PEI  
 Period: **2018-2019**  
 Start Date: **01/01/2018**  
 End Date: **12/31/2019**

US Department of Housing and Urban Development  
 OMB Approval 2535-0114 exp. 2/28/2012

Year 1

Year 1

HUD Goals	Policy Priority	Problem, Need, Situation	Services or Activities/Outputs	Measure			Outcome	Measure			
				Pre	Post	YTD		Pre	Post	YTD	
1	Policy	2	3	4			5	6			
A.4	A	There is a need for investigating systematic violations of the Fair Housing Act or substantially equivalent State and Fair Housing local laws.	Programming Recruit testers Train testers Rental complaints intake and/or processed Test sites identified new- Paired tests conducted Tests retested new- Testers debriefed Tests show differential treatment Targeted investigations Witnesses interviewed Property searches Develop protocol for referrals new- Assess case merit	Persons			Cases resolved	Persons			
A.6	B.6			20			Cases resolved	35	Persons		
B.1	C.1			Persons			Cases resolved	35	Persons		
B.2	C.2			20			Cases resolved	35	Persons		
B.3	D			120			Cases resolved	85	Persons		
B.4	E			Sites			Cases resolved	20	Persons		
C.3	F.1			Tests			new- Paired tests indicate discrimination or need for further	20	Tests		
C.4	F.6			50			new- Paired tests indicate discrimination or need for further	20	Tests		
C.5	G			10			new- Paired tests indicate discrimination or need for further	4	Tests		
D.1	H.1			50			new- Paired tests indicate discrimination or need for further	20	Tests		
D.2	I.1			15			Cases resolved to benefit client	12	Persons		
D.3	I.2			Tests			Housing Units opened up from discrimination	10	Units		
D.4				5			Cases resolved	15	Persons		
F.2		20			Cases resolved	15	Persons				
F.3		20			Cases resolved	15	Persons				
		1			Use tracking system for referrals	25	Referrals				
A.4	A	120			Cases resolved	85	Persons				
A.6	B.6	5			Cases resolved to benefit client	4	Persons				
B.1	C.1	20			Cases resolved to benefit client	20	Persons				
B.2	C.2	20			Requests for accommodations/modification	10	Persons				
B.3	D	15			Complaints closed with advice	20	Complaints				
B.4	E	20			Cases resolved to benefit client	12	Persons				
C.3	F.1	15									
C.4	F.6	20									
C.5	G	20									
D.1	H.1	15									
D.2	I.1	20									
D.3	I.2	15									



Applicant Name: **City Corporation of Central Massachusetts**  
 Project Name: **Procter Fair Housing Project**  
 Project Type: **Construction**  
 Construction Type: **Construction**

Program: **Fair Housing PEI**  
 Period: **2014-2015**  
 Start Date: **01/01/2014**  
 End Date: **12/31/2015**

US Department of Housing and Urban Development  
 OMB Approval 2535-0114 exp. 2/28/12

HUD Goal Priority	Policy Priority	Problem, Need, Situation	Services or Activities/Outputs	Measure			Outcome	Measure		
				Pre	Post	YTD		Pre	Post	YTD
1	Policy	Planning	Programming				Impact			
	D.4		Expert witnesses procured	2	Persons		Cases resolved to benefit client	2	Persons	
	F.2		Allegations litigated	15	Litigations		Cases resolved to benefit client	12	Persons	
	F.3		Allegations mediated	5	Mediations		Cases resolved to benefit client	4	Persons	
			Monitor settlement agreements	5	Agreements		Cases resolved to benefit client	4	Persons	
			Fair housing education/training	120	Persons		Clients indicate use of PEI program as a result of	20	Persons	
			Sessions/training for non-English speakers	2	Sessions		Clients indicate use of PEI program as a result of	10	Persons	
			Publications distributed to recipients	5000	Persons		Clients indicate use of PEI program as a result of received	50	Persons	
			Non-English speakers receive translated fair housing materials	1000	Persons		Clients indicate use of PEI program as a result of received	10	Persons	
			Staff training	40	Persons		Develop protocol for referrals	2	Protocols	
			Partnerships w/local government	2	Partnerships		Develop protocol for referrals	2	Protocols	
			Partnerships w/local agencies/orgs	2	Partnerships		Develop protocol for referrals	2	Protocols	
			Meetings w/local groups	20	Meetings		Clients indicate use of PEI program as a result of attending	8	Persons	
			Policy Priority – Provided FHA insured mortgage information	25	Households		Policy Priority – Elected to obtain an FHA insured mortgage	5	Households	
			Policy Priority – Provided Fair Lending information	25	Households		Policy Priority – Fair Lending – Referred to Fair Housing Agency	5	Households	
					#N/A				#N/A	
					#N/A				#N/A	
					#N/A				#N/A	
					#N/A				#N/A	
					#N/A				#N/A	
					#N/A				#N/A	

Year 1









**General Component**  
**Evaluation Tools**

7

**Accountability**

**A. Tools for Measurement**

Enforcement log

Database

Outcome scale(s)

Intake log

Program specific form(s)

**B. Where Data Maintained**

Agency database

Individual case records

Agency database

Agency database

**C. Source of Data**

Testing results

Referrals

Statistics

Referrals

Testing results

**D. Frequency of Collection**

Quarterly

Upon incident

Quarterly

Upon incident

Quarterly

**E. Processing of Data**

Relational database

Development

008 Pending

Component Name:

**General Component**

**Evaluation Tools**

7

Accountability

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**Race and Ethnic Data  
Reporting Form**

U.S. Department of Housing  
and Urban Development  
Office of Administration

OMB Approval No. 2535-0113  
(exp. 10/31/2009)

Program Title:

Worcester Fair Housing Project

Grantee/Recipient Name:

Legal Assistance Corporation of Central Massachusetts

Grantee Reporting Organization:

Legal Assistance Corporation of Central Massachusetts

Reporting Period From (mm/dd/yyyy): 10/01/2008

To (mm/dd/yyyy): 09/30/2009

Racial Categories	Total Number of Race Responses	Total Number of Hispanic or Latino Responses
American Indian or Alaska Native	2	0
Asian	8	0
Black or African American	40	12
Native Hawaiian or Other Pacific Islander	0	0
White	70	13
American Indian or Alaska Native <i>and</i> White	0	0
Asian <i>and</i> White	0	0
Black or African American <i>and</i> White	0	0
American Indian or Alaska Native <i>and</i> Black or African American	0	0
* Other multiple race combinations greater than one percent: [Per the form instructions, write in a description using the box on the right]	0	0
Balance of individuals reporting more than one race	0	0
<b>Total:</b>	120	25
* If the aggregate count of any reported multiple race combination that is not listed above exceeds 1% of the total population being reported, you should separately indicate the combination. See detailed instructions under "Other multiple race combinations."		

Public reporting burden for this collection is estimated to average 1.15 hours per response, including the time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the information collection instrument. HUD may not collect this information, and you are not required to complete this form unless it displays a currently valid OMB control number.

**Factor 3:  
Soundness of Approach**

Support of Policy Priorities

The Worcester Fair Housing Project will assist residents of Worcester County, Massachusetts in enforcing their rights under state and federal fair housing laws. As is more fully described below, the Project's mission of ensuring access to housing is related to several of HUD's Policy Priorities, specifically: (a) providing increased homeownership and rental opportunities for low- and moderate-income persons, persons with disabilities, the elderly, minorities, and persons with limited English proficiency; (b) improving our nation's communities; (c) encouraging accessible design features; (d) providing full and equal access to grassroots faith-based and other community organizations in HUD program implementation; (e) participation of minority-serving institutions in HUD programs; (f) ending chronic homelessness; (g) removal of regulatory barriers to affordable housing; (h) promoting energy efficiency and Energy Star; and (i) utilization and promotion of FHA mortgages and fair lending practices.

Geographic area to be served

The Project plans to serve all persons in Worcester County who have experienced discrimination in housing under federal and state laws. Worcester County, in central Massachusetts, runs from New Hampshire in the north to Rhode Island and Connecticut in the south and, according to the 2000 census, has a population of 752,757 persons.

Persons to be served and methodology for carrying out activities

The Project will serve all residents of Worcester County who are protected by the federal fair housing laws and by similar state laws (using non-FHIP funds for any solely state-based housing discrimination cases). The Project will engage in outreach and

education activities, take complaints from victims of discrimination, conduct investigations and do testing where appropriate, refer meritorious complaints to state and federal agencies, and litigate cases in federal and state administrative and judicial forums.

*Outreach, Education, and Intake activities:* The Project's staff will conduct education and outreach activities throughout Worcester County, distributing written materials at social service agencies and public places, publicizing the Project through appearances in local media, and conducting fair housing workshops for targeted audiences. Project staff will interview victims of housing discrimination at sites throughout the area and will take 120 fair housing complaints that will then be referred to Project attorneys. The Project will provide written translation and oral interpretation services for any limited English proficiency persons who need them.

*Testing and Investigation activities:* The Project will conduct a total of 50 paired tests, both complaint-specific and audit. Testers will be screened to ensure that the following requirements are met: testers must not have felony convictions or convictions for crimes involving fraud or perjury; testers must receive training or be experienced in testing procedures; and testers must not have an economic interest in the outcome of the test, be a relative of any party in the case, have had any employment or other affiliation, within one year, with the person or organization to be tested, or be a competitor of the person or organization to be tested in the listing, rental, sale, or financing of real estate.

All testers will attend a four-hour training program. After going through the training, each new tester will complete a practice test and be debriefed by the testing coordinator before being assigned to do real tests. Before carrying out an actual test, each tester will review his/her assignment with the testing coordinator. The coordinator will

give all testers a written assignment which includes all of their characteristics for the test and instructions about when and whom to call. In order to maintain total objectivity, testers will not be told the nature of the test, whether they are the protected or unprotected tester, or who the other tester is. In a typical test, at least two testers will contact the person or organization to be tested. The testers in each test will have the same or substantially equivalent demographic profiles except for the factor that is the basis of the alleged discrimination. The protected tester will typically have attributes which are slightly more favorable than those possessed by the unprotected tester (e.g., a slightly higher income or a slightly more stable rental history). The testers in a test will identify the same housing needs and express similar levels of interest in the units they are shown.

Testers in a telephone test will call the entity being tested within a very short time of each other. The protected tester will call first. Testers will immediately record on a specific Telephone Test Report Form or Answering Machine Report Form all information about the call, including the outgoing message on an answering machine, the message the tester left on a machine, and all conversations. Similarly, testers in an e-mail test will send e-mails within a very short time of each other and record the information on an E-mail Report Form. For a site visit, the protected tester will go first, followed as soon as possible by the unprotected tester. Immediately after the site visit (out of view of the entity tested), the testers will use a Site Visit Report Form to record all information gathered and interactions that took place during the visit. After a test is completed and the Project's forms filled out, each tester will meet with the testing coordinator to debrief and hand in the requisite forms. The coordinator will check the forms for completeness and for disparities in the treatment of the testers.

*Enforcement activities:* The Project has a knowledgeable and experienced core of fair housing litigators who will aggressively enforce and vindicate the rights of victims of housing discrimination. After merit assessments, these advocates will assist clients who have been denied the opportunity to rent the housing of their choice for illegal discriminatory reasons or who have faced unequal or discriminatory treatment in their rental housing because of their membership in a protected class. Such assistance will take the form of helping to get reasonable accommodations or modifications for disabled persons; referring meritorious complaints to HUD and the Mass. Commission Against Discrimination (“MCAD”); obtaining favorable pre-filing resolutions; filing cases in state and federal court; and mediating and litigating meritorious cases. In addition to obtaining monetary damages for clients, the Project will obtain injunctive relief in appropriate cases, including requirements that housing providers attend fair housing trainings; place the fair housing logo and equal housing opportunity slogan on advertisements and publications; and maintain records of and report on their rental practices. The Project will monitor all settlement agreements to ensure compliance by housing providers.

A. Providing increased homeownership and rental opportunities for low- and moderate-income persons, persons with disabilities, the elderly, minorities, and persons with limited English proficiency.

For the policy priority of providing increased homeownership and rental opportunities, the Project will target persons who have traditionally been impeded in their search for decent and affordable rental housing. LACCM -- which has provided a full range of civil legal services to low- and moderate-income persons for over 50 years -- brings to this task an enormous wealth of contacts in the community and established

relationships with local groups and agencies. LACCM will call upon its long-standing relationship with the area Agency on Aging (which has funded LACCM for over 20 years) to reach the elderly population of the region. LACCM will conduct effective outreach to minority groups through its Vietnamese and African outreach workers, its collaboration with the local Minority Serving Institution (Atlantic Union College) and its Board members who represent traditionally underserved segments of the community. It will also use its contacts in the disability rights community, including a client group (Rights, Equality, and Dignity for the Disabled), with which it has worked on various accessibility projects, to reach persons with disabilities. The Project's bi-lingual (English and Spanish) intake worker and bi-lingual (English and Vietnamese) paralegal will provide interpreter and translation services for LEP persons. As a result of outreach efforts, the Project will encounter victims of discrimination and will do intakes, perform tests and other investigative measures, and file appropriate complaints.

**B. Improving our nation's communities.**

The Project will focus its enforcement efforts to improve the environmental health and safety of families by ensuring housing providers' compliance with lead laws and health and safety codes. In particular, the Project will work to overcome barriers identified in Worcester's Analysis of Impediments by targeting its efforts to families with children under the age of six where owners have refused to de-lead units. Refusal to de-lead is often a violation of both federal law, which prohibits discrimination based on familial status, and state law, under which a refusal to rent or sell a dwelling unit to a family with children because of the presence of lead constitutes illegal housing

discrimination.<sup>1</sup> Therefore, complaints that a landlord has denied housing to a family with children, or complaints that a housing owner will not de-lead, constitute complaints of housing discrimination based on familial status (the presence of children), and the Project will conduct tests of such complaints. If a test substantiates that housing discrimination has occurred where an owner refuses to rent to a family because of the presence of lead or where an owner refuses to de-lead, the Project will seek relief including a court order that the unit not be rented to anyone else, that the unit be de-lead, and that the unit be rented to the complainant. Meritorious cases may also be referred to HUD or MCAD.

C. Encouraging accessible design features.

The Project will focus its enforcement efforts on assisting disabled tenants and applicants for housing to get reasonable accommodations and modifications so that they can fully utilize the housing of their choice. Using unique aspects of Massachusetts law, under which an owner of housing with ten or more units, at his or her own expense, must make reasonable modifications for a disabled tenant, the Project will vigorously enforce the rights of the disabled to reasonable modifications.<sup>2</sup> The Project staff will, in appropriate cases, file complaints with HUD and the MCAD regarding a housing provider's failure to make a required accommodation or modification, and will ask the court for a restraining order to get the necessary work completed.

The Project will also work with the City of Worcester to encourage and support local CDBG-funded community development corporations (CDCs) to improve visitability, universal design, and accessible design features in the buildings they develop.

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<sup>1</sup> See Mass. Gen. Laws c. 111, §199A.

<sup>2</sup> See Mass. Gen. Laws c. 151B, sec. 7A(1).

Project staff will provide technical assistance and counsel, when appropriate, to the CDCs as they work on these accessibility issues in their buildings. The Project's Intake Worker, Ivette Moore, was a property manager at a Worcester CDC for several years, and will be a key component in this work with local CDCs.

D. Providing full and equal access to grassroots faith-based and other community-based organizations in HUD program implementation.

The Project will work with Worcester Interfaith, a grassroots faith-based organization comprised of 20 religious congregations of different faiths which works to foster relationships within the community across religious and racial lines. The Project will educate members of Interfaith's congregations about fair housing laws, recruit testers from Interfaith's congregations, and take discrimination complaints from persons reached through this collaboration.

E. Participation of minority-serving institutions in HUD programs.

The Project will work with the local Minority-Serving Institution, Atlantic Union College in Lancaster, Mass., to educate its students and staff about fair housing laws and to recruit testers from the campus. The College is a Seventh-Day Adventist institution that seeks to prepare its diverse student population for service to the community.

F. Ending chronic homelessness.

The Project will provide services to homeless shelter residents and other homeless individuals so as to permit them to become productive members of society. By working with LACCM's long-standing homelessness program (the Honorable Harry Zarrow Homeless Advocacy Project), through which attorneys conduct intake at homeless shelters and other agencies serving the homeless, the Project will identify and assist

homeless clients in resolving legal problems that constitute barriers to self-sufficiency and will ensure that they get the referrals they need to access various social services. The Project will also work with Worcester's Comprehensive Assessment and Intervention Network ("CHAIN"), which has developed a Housing First model to provide chronically homeless persons with a home along with health and support services; LACCM's Executive Director sits on CHAIN's Advisory Council.

For housing applicants who, because of disability-related behaviors, may be denied housing because of their disability, the Project will assist in administrative appeals of such denials and, where appropriate, litigation. For tenants who have recently escaped homelessness and are facing eviction for disability-related behaviors, the Project will provide representation in eviction actions, raising defenses and counterclaims related to reasonable accommodations and modifications. The Project will also provide education for housing providers about such issues as how to accommodate a disabled applicant who cannot come to a management office, the legality of a housing denial for past behavior caused by a disability, and the types of reasonable accommodation that might be appropriate for a mentally ill tenant whose behavior rises to the level of a lease violation.

G. Removing Regulatory Barriers to Affordable Housing.

Attached to the application are form HUD-27300 and a separate attachment naming points of contact and indicating where back-up information may be found.

H. Promoting energy efficiency and Energy Star.

The Project will include in its outreach to low- and moderate-income renters information on the benefits of using Energy Star products and appliances and replacing items such as older obsolete appliances with Energy Star products. The Project will also

encourage Worcester's CDBG-funded CDCs to build housing units in compliance with Energy Star Guidelines. Finally, the Project will include information about energy-efficiency measures and Energy Star standards and products in its counseling sessions about FHA mortgages and fair lending practices.

I. Utilization and promotion of FHA mortgages and fair lending practices.

The Project will work closely with the City of Worcester's NeighborWorks Homeownership Center to ensure that low- and moderate-income homeowners facing foreclosure or attempting to refinance their mortgages are informed about FHA products and about fair lending and discriminatory lending practices. This information will be provided to consumers in languages appropriate for their needs. This collaborative work will assist the City in fulfilling its stated goal of promoting awareness among its residents of predatory lending practices.<sup>3</sup> LACCM's work with the City on devising strategies for foreclosure intervention and prevention has been acknowledged in the City's Action Plan for saving neighborhoods in the face of the mounting foreclosure crisis.<sup>4</sup>

Performance Measures/Outcomes

The Project will assess 120 complaints by persons experiencing discrimination in their search for housing, their efforts to maintain their housing, or their attempts to access housing programs. The Project will obtain favorable pre-filing closings for 20 persons; litigate 15 cases and reach successful resolutions for at least 12 persons; mediate 5 cases, reaching a successful resolution for another 4 persons; and monitor settlement agreements for 5 persons. At least 15 of the 120 complaints will be from persons who

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<sup>3</sup> See page 8 of the City of Worcester's 2004 Community Development Plan Housing Policy, available at <http://ci.worcester.ma.us/reports/CDPHousingPolicy.pdf>.

<sup>4</sup> See page 12 of the City's *S.A.V.E. Our Neighborhoods Action Plan*, available at <http://www.ci.worcester.ma.us/reports/SAVEPlan.pdf>.

have been denied housing or otherwise discriminated against based on their disability, and the Project will obtain reasonable modifications or accommodations for 10 persons.

The Project's testing program will effectively and objectively identify instances of housing discrimination. The Project will recruit and train 20 new testers from throughout Worcester County and will conduct 50 paired complaint-based or audit tests.

The Project will give at least five workshops on disability, reasonable accommodations and reasonable modifications in private housing; refusal to rent based on race and national origin; refusal to rent based on familial status and refusal to de-lead; and reasonable accommodations in the application, admission, and eviction processes in public and subsidized housing. The total number of people in attendance at these workshops will be at least 120. Two of these workshops will focus on race and national origin; one will be conducted in Spanish, one will be conducted in Vietnamese, and at least 20 non-English speakers will attend the two workshops. In addition, the Project will conduct four workshops with the City of Worcester's NeighborWorks Homeownership Center to educate low- and moderate-income households about FHA products as reliable, safe alternatives for consumers facing foreclosure and for consumers seeking an affordable refinancing option. These four workshops will also educate consumers about fair lending and discriminatory lending practices. Appropriate oral and sign interpreters and written translations shall be provided as necessary.

The Project will create and distribute 5,000 brochures and 100 posters about all classes protected under the Act. The brochures will be in English, Vietnamese and Spanish, and will be distributed throughout Worcester County, to government offices, social service agencies, and housing providers.

# Grant Application Detailed Budget Worksheet

OMB Approval No. 2501-0017  
(Exp. 01/31/2009)

Name and Address of Applicant:  
**City of Worcester/Office of Human Rights**  
**25 Meade St.**  
**Worcester, MA 01610**  
**PEI-2008**

Category

Detailed Description of Budget (for full grant period)

Public reporting burden for this collection of information is estimated to average 3 hours 12 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

1. Personnel (Direct Labor)	Estimated Hours	Rate per Hour	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other City of Worc.	Program Income
Inlake Worker (80%)	1,665	\$17.00	\$28,305	\$28,305							
Executive Director (15%)	315	\$31.00	\$9,765							\$9,765	
Total Direct Labor Cost			<b>\$38,070</b>	<b>\$28,305</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$9,765</b>	<b>\$0</b>
2. Fringe Benefits											
Inlake Worker (80%)	26.94%	\$28,305	\$7,624	\$7,624							
Executive Director (15%)	26.94%	\$9,765	\$2,631							\$2,631	
Total Fringe Benefits Cost			<b>\$10,255</b>	<b>\$7,624</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$2,631</b>	<b>\$0</b>
3. Travel											
3a. Transportation - Local Private Vehicle											
	Mileage	Rate per Mile	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Trans - Local Private Vehicle											

# Grant Application Detailed Budget Worksheet

## Detailed Description of Budget

	Trips	Fare	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
<b>3b. Transportation - Airfare (show destination)</b>											
Subtotal - Transportation - Airfare											
<b>3c. Transportation - Other</b>	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Transportation - Other											
<b>3d. Per Diem or Subsistence (indicate location)</b>	Days	Rate per Day	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Per Diem or Subsistence											
<b>Total Travel Cost</b>			\$0								
<b>4. Equipment (Only items over \$5,000 Depreciated value)</b>	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
<b>Total Equipment Cost</b>											

# Grant Application Detailed Budget Worksheet

5. Supplies and Materials (Items under \$5,000 Depreciated Value)												
Detailed Description of Budget												
5a. Consumable Supplies	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income	
Subtotal - Consumable Supplies												
5b. Non-Consumable Materials												
	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income	
Subtotal - Non-Consumable Materials												
Total Supplies and Materials Cost												
6. Consultants (Type)												
	Days	Rate per Day	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income	
Total Consultants Cost												
7. Contracts and Sub-Grantees (List Individually)												
	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income	
Total Subcontracts Cost												



# Grant Application Detailed Budget Worksheet

	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
<b>8f. Project inspection fees</b>											
Subtotal - Project inspection fees											
<b>8g. Site work</b>											
Quantity		Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Site work											
<b>8h. Demolition and removal</b>											
Quantity		Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Demolition and removal											
<b>8i. Construction</b>											
Quantity		Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Construction											
<b>9. Equipment</b>											
Quantity		Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Equipment											
<b>8k. Contingencies</b>											
Quantity		Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Contingencies											
<b>8l. Miscellaneous</b>											
Quantity		Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Miscellaneous											
<b>Total Construction Costs</b>											



**Factor 4:  
Leveraging Resources**

The Worcester Fair Housing Project is a partnership between the Legal Assistance Corporation of Central Massachusetts (“LACCM”) and the City of Worcester. By leveraging the resources of these two organizations, both of whom are strongly committed to the furtherance of civil rights, we will be able to implement this program which is designed to reduce the incidences of housing discrimination in the community.

LACCM brings additional resources to this Project which are available to support its fair housing advocacy work. In the current fiscal year, LACCM will receive [REDACTED] in General Support funding from the Massachusetts Legal Assistance Corporation (“MLAC”), an umbrella organization that provides funding to the local civil legal services programs in Massachusetts. MLAC obtains its General Support funding through legislative appropriations and through funds generated by the Interest on Lawyer’s Trust Accounts (“IOLTA”) program. MLAC has provided funding to LACCM for the past 25 years. During the current fiscal year, MLAC anticipates distributing just over \$15,000,000 in General Support funding to local programs such as LACCM. LACCM receives an annual percentage of the General Support funding to serve clients in the central Massachusetts region and utilizes such funding in support of its local program priorities. Inasmuch as program priority-setting surveys have repeatedly identified housing issues, including fair housing, as one of the most important legal issues that clients face, MLAC has specifically committed [REDACTED] of General Support funding to the activities that LACCM will carry out under the Worcester Fair Housing Project.

A firm letter of commitment from MLAC for the [REDACTED] for the use of General Support funding for the Worcester Fair Housing Project is included in this application.

In addition to the resources described above, the City of Worcester is also committing resources to this Project. Through its partnership with the Worcester Human Rights Office, LACCM is able to leverage additional resources from the City in the form of a third-party cash match of \$12,396. The cash match from the City of Worcester will be used to support the salary and related expenses of Frances Manocchio, the Director of the City of Worcester's Human Rights Office, who will devote 15 percent of her time to the Project. Ms. Manocchio will focus her contributions to this project on the design and implementation of the HUD referral process at the City; the design and delivery of complaint intake efforts in the Latino community; and supervision of the Project's intake worker. The intake worker will hold regular intake hours at social service agencies in the city that serve the Latino community; inform Latinos and others of their fair housing rights; accept complaints from those alleging that they have been subject to discrimination; and make referrals to LACCM attorneys staffing the Project.

A firm letter of commitment from the City of Worcester for the \$12,396 match is included in this application.

**Factor 1:  
Applicant's Capacity and Relevant Organizational Experience**

Introduction

The Legal Assistance Corporation of Central Massachusetts ("LACCM") is a non-profit program that provides free civil legal services to low-income and elderly residents of Worcester County, Massachusetts. LACCM's mission is to protect and advance the legal rights of low-income, elderly and other disenfranchised people, in order to secure access to basic needs and to challenge institutional barriers to social and economic justice. Over the last several years, LACCM has developed an expertise in, and devoted substantial resources to, fair housing investigation, testing, enforcement, education, and outreach, as described more fully below.

LACCM's partner for this grant is the City of Worcester. Worcester is located in central Massachusetts and, according to the 2000 census, has a population of 172,648 persons. The City, through its Office of Human Rights and its Human Rights Commission, is committed to eliminating housing discrimination within the City and to ensuring that all people are treated fairly and equally under the law.

a. Number and Expertise of Staff

A total of eight staff from LACCM and two City employees will be assigned to the Project on a full-time or part-time basis.

[REDACTED] will devote 1,638 hours (90% of her time based on a 35-hour week) to the Project and serve as the day-to-day Program Manager. She will be stationed in LACCM's office in the City of Worcester, the county's largest metropolitan area.

Attorney [REDACTED] has been a Legal Services lawyer for ten years, the past eight with LACCM, where she has specialized in housing and domestic violence matters. She has

substantial experience in fair housing testing, education and outreach, having served as Program Manager for LACCM's prior PEI grant (No. FH700G05089) and LACCM's current PEI grant (No. FH700G07055). Under the new grant, if funded, Attorney [REDACTED] will run the Project's testing program, oversee the intake of all complaints for the Project, and participate in outreach and training workshops. She will oversee compliance with HUD's grant requirements, and she will ensure that timely program and financial reports are submitted and that all program requirements and benchmarks are met.

[REDACTED] LACCM's Managing Attorney, will devote 91 hours (5% of her time based on a 35-hour week) to the Project. [REDACTED] who is fluent in English and Spanish, has been a practicing Legal Services attorney for over 22 years, specializing in the rights of low-income tenants and residents of homeless shelters. [REDACTED] is an experienced trial lawyer and has defended many tenants in eviction cases in which discrimination claims, especially reasonable accommodation claims, were raised. She often serves as a trainer on tenant rights and homelessness issues. [REDACTED] will focus her contributions to the Project on supervising the Program Manager and ensuring that the Project objectives are being met.

[REDACTED] LACCM's Executive Director, will devote 91 hours (5% of his time based on a 35-hour week) to the Project. [REDACTED] has been a practicing attorney for over fourteen years and has substantial experience in fair housing matters. Throughout his career, he has litigated many housing discrimination cases in various forums, including the Massachusetts Commission Against Discrimination ("MCAD," which is the state's largest FHAP) and state and federal courts. [REDACTED] has designed and delivered fair housing trainings for various groups, and he has designed and

overseen fair housing tests. [REDACTED] was recently appointed by Governor Deval Patrick to serve as a member of the Advisory Committee for the MCAD, following his service on the four-person search committee which advised the governor on the selection of the new MCAD Commissioners. Using his expertise in fair housing law, [REDACTED] will focus his contributions to the Project on reviewing litigation strategies and ensuring that all grant requirements are met.

[REDACTED] a LACCM staff attorney, will devote 1820 hours (100% of her time based on a 35-hour week) to the Project. [REDACTED] is fluent in English and Spanish. Since joining LACCM's staff in 2007, she has filed a number of housing discrimination actions at the MCAD and assisted many tenants in their eviction cases by raising fair housing claims, including reasonable accommodation claims. Since February 2008, she has been the primary litigator under LACCM's current PEI grant. [REDACTED] will focus her contributions to the Project on litigating fair housing cases at the MCAD and in state and federal court.

[REDACTED] a LACCM staff attorney, will devote 364 hours (20% of her time based on a 35-hour week) to the Project. Under LACCM's prior and current PEI grants, she has worked on fair housing cases in the MCAD and in state and federal court. [REDACTED] has assisted many tenants threatened with eviction or the loss of affordable housing due to discriminatory reasons, and will continue to do so under the proposed grant.

[REDACTED] a staff attorney in LACCM's housing unit, will devote 182 hours (10% of her time based on a 35-hour week) to the Project. [REDACTED] is LACCM's foreclosure defense specialist. In that role, she assists low- and moderate-income homeowners facing foreclosure, advises tenants in buildings that have been foreclosed

on, and creates written materials in English and Spanish advising homeowners and tenants about their rights during the foreclosure process. She works in conjunction with the City of Worcester's NeighborWorks Homeownership Center to conduct training sessions for consumers, and participates in a state-wide network designing strategies for foreclosure intervention and prevention. [REDACTED] will devote her time under the grant to leading workshops for consumers about FHA products and unfair lending practices.

[REDACTED] a bi-lingual (Vietnamese and English), bi-cultural paralegal will devote 182 hours (10% of his time based on a 35-hour week) to the Project. [REDACTED] has extensive experience conducting outreach to the Vietnamese community in Worcester County. He will focus his contributions to the Project on intake and outreach within Worcester's Vietnamese community, focusing on the elderly.

[REDACTED] a secretary in LACCM's housing unit, will devote 728 hours (40% of her time based on a 35-hour week) to the Project. [REDACTED] is bi-cultural and bi-lingual in English and Spanish. She will provide direct program support and will assist in the creation of fair housing brochures and posters. Among other administrative tasks, she will assist in the coordination of tester trainings and fair housing workshops and help the Program Manager compile and update records and logs and maintain the Project's files.

[REDACTED] has provided similar administrative and program support to LACCM's fair housing work under LACCM's prior and current PEI grants.

[REDACTED] the Executive Director of the City of Worcester's Human Rights Office for the past five years, will devote 315 hours (15% of her time based on a 40-hour week) to the Project. [REDACTED] has spent over twenty years in the field of human services, focusing on issues of diversity and inclusion. She has held leadership

positions with a number of organizations, including the United Way of Central Massachusetts and the National Conference for Community and Justice (Worcester County Region). She has extensive experience in the design and delivery of community education and training programs. [REDACTED] will focus her contributions to the Project on supervising the City's Intake Coordinator and advising complainants on their fair housing rights.

[REDACTED] will serve as the Project's Intake Coordinator. Under the supervision of the Director of Human Rights, she will devote 1,665 hours (80% of her time based on a 40-hour week) to the Project. [REDACTED] has an extensive background in property management, resident services and human services. As a bi-cultural and bi-lingual (in English and Spanish) individual, she is able to provide accessible services to the City's significant Latino population. She will establish intake sites throughout the City, where she will conduct initial investigations of complaints, interview victims of housing discrimination, and refer all appropriate complaints to LACCM. She will also conduct education and outreach activities to Latino communities throughout the City and distribute the Project's written materials at public places.

The City of Worcester has nine Human Rights Commissioners who work closely with the Director of the Human Rights Office, Frances Manocchio. The Commissioners are trained on fair housing law by Project attorneys at LACCM. Commissioners will interview and counsel victims of housing discrimination at sites across the city and assist them in filling out and filing complaints, as appropriate. The Commissioners will also provide outreach to the community and will participate in public forums and educational events sponsored by the Project.

b. Organizational Experience

Legal Assistance Corporation of Central Massachusetts (“LACCM”)

LACCM has been the primary provider of civil legal services to low-income and elderly people in Worcester County for over fifty years. LACCM provides services to approximately 3,500 individuals each year in a wide variety of substantive areas.

LACCM does not have any affiliate or subsidiary organizations.

LACCM was the recipient of a PEI grant (No. FH700G05089), from January 15, 2006 through January 14, 2007. During that grant, the Project investigated 149 complaints of housing discrimination, conducted six tester trainings, conducted 43 paired fair housing tests, obtained relief for many clients, distributed thousands of fair housing brochures, flyers and posters around the community, and provided multiple community trainings on fair housing laws.

During the first quarter of LACCM’s current PEI grant (No. FH700G07055), the Project received 36 complaints of housing discrimination, certified seven testers, conducted 14 paired fair housing tests, obtained relief for several clients, distributed thousands of English and Spanish fair housing brochures and flyers around Worcester County, and provided community trainings on fair housing laws. The Project also continued working on Vietnamese and Portuguese translations of its fair housing materials, and worked with the North Central Minority Coalition to co-sponsor a forum on structural racism with a focus on race discrimination in housing.

Since 1998, LACCM has received funding from the Massachusetts Bar Foundation on an annual basis for the specific purpose of conducting fair housing training and enforcement. Under these grants, LACCM (at times in the past in

partnership with the Housing Discrimination Project (“HDP”), now the Massachusetts Fair Housing Center) has processed approximately 100 intakes per year, conducted investigations and tests of fair housing complaints, brought multiple enforcement actions at the MCAD and in state and federal court, and presented many fair housing community trainings. LACCM no longer partners with HDP, since HDP is now focusing its efforts in large part outside of Worcester County, in the western part of the Commonwealth.

LACCM has also been a subcontractor to HDP in connection with two HUD grants: a Private Enforcement-Joint Enforcement Project grant in 1999 (No. FH700G98-017) and a Private Enforcement-Fair Housing Partnership grant in 2001 (No. FH700G00-030). Under the subcontractor agreements, LACCM consulted about the design and implementation of fair housing tests, filed numerous enforcement actions, conducted fair housing trainings, and assisted HDP with its grant reporting requirements to HUD (including the completion of quarterly enforcement logs).

LACCM has devoted significant staff resources to fair housing litigation for many years. LACCM’s team of lawyers has litigated cases in a wide variety of forums and has obtained, in addition to monetary relief for clients, substantial injunctive relief designed to eliminate discriminatory practices, including requirements to advertise using the fair housing logo, attend fair housing training sessions, and report on ongoing rental practices. LACCM’s litigation efforts are regularly highlighted in the local press<sup>1</sup> and have also resulted in a number of reported decisions.<sup>2</sup>

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<sup>1</sup> See, e.g., *Children and Disabled Pushed Away*, Worcester Telegram & Gazette, 6/9/08 (about LACCM’s complaint against a landlord who denied an apartment to a woman and her family after finding out that she was pregnant); *Condo to Settle Lawsuit*, Worcester Telegram & Gazette, 3/14/06 (about LACCM’s lawsuit in federal court alleging that a large condominium complex discriminated against families with children by using rules which prevented these families from enjoying the same residency rights as other residents).

<sup>2</sup> See, e.g., *In re Benham*, 2008 WL 397668 (Bnkr. D. Mass. 2008) (LACCM staff tried a housing discrimination case in state housing court that resulted in a judgment of \$46,103.63 and extensive

In addition to funding related to fair housing activities, LACCM's total operations are supported with funding from a wide variety of federal, state, foundation and private sources, totaling over 3.5 million dollars per year. As a recipient of these grants, LACCM has administered projects similar in scope and complexity to the Project proposed herein, with regular invoices of a style similar to that contemplated for the PEI. LACCM's federal grants include ongoing funding, beginning in 2001, from the U.S. Department of Justice for civil legal assistance to domestic violence victims. LACCM has also been receiving funding through Title IIIB of the Older Americans Act for over twenty years, funding from the United Way for over twenty years, and funding from the Commonwealth of Massachusetts (through the Massachusetts Legal Assistance Corporation ("MLAC")) for over twenty years. LACCM also received a three-year U.S. Department of Commerce Technology Opportunity Program grant which ended in 2005. Under that grant, LACCM established a knowledge-base of landlord-tenant and fair housing questions and answers, and held "chats" with clients in real time via a web browser, answering inquiries on housing law and completing forms. The knowledge-base is still accessible to anyone with Internet access, and LACCM advocates now use the technology to answer landlord-tenant and fair housing questions via e-mail.

LACCM is subject to rigorous monitoring and review by its various funders, particularly MLAC. In late 2007, an on-site assessment of LACCM was conducted for

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injunctive relief; bankruptcy court subsequently ruled that the judgment was exempt from discharge); Gardner v. Pianka, 2006 WL 2918563 (MCAD 2006) (LACCM staff represented a victim of familial status discrimination at a public hearing held at the MCAD; the MCAD hearing officer ordered the landlord to cease and desist from refusing to rent to families with children and to pay \$10,000 in damages and \$5,000 as a civil penalty); Rodriguez v. Montalvo, 337 F. Supp. 2d 212, 214-17 (D. Mass. 2004) (court authorized attachment of defendant landlord's property in the amount of \$75,000 in case where LACCM staff represented a young man with Duchenne's Muscular Dystrophy whose landlord refused to give him permission to have a ramp installed as a reasonable modification).

MLAC by a team of reviewers. The team noted that LACCM's Director has "committed the program to the production of excellent legal work [and] has hired excellent advocates. . ." The team concluded that LACCM is in compliance with MLAC's six performance standards: strategic and collaborative partnerships; development and utilization of resources; client access; quality assurance; effective management and administration; and governance.

At the conclusion of LACCM's January 2006-January 2007 PEI grant (No. FH700G05089), the Project received its evaluation from HUD, and got a rating of "Excellent," with a score of 100 out of 100.

#### City of Worcester

The City of Worcester is firmly committed to creating an environment where its residents have equal access to the housing of their choice and fair housing laws are respected. In order to meet its non-discrimination goals in housing and other areas, the City established the Human Rights Commission in 1971. The Commission works to prevent or eliminate prejudice, intolerance and bigotry through education, mediation and enforcement. The Commission receives complaints of discrimination and can initiate its own investigation of discrimination in housing, employment, and other areas. Through the City's Law Department, the Commission has the power to subpoena witnesses to any formal investigation it may conduct, and the results of any investigation may be referred to state and federal authorities, such as HUD.

The Commission also has broad authority to engage in educational and other activities aimed at increasing awareness of civil rights issues and publicizing the attainment of harmonious inter-group relationships. Beginning in the 1980s, the

Commission undertook an active marketing campaign about fair housing that included placing billboards throughout Worcester and neighboring towns, and creating posters, pins, pens and other materials with a consistent message about the importance of fair housing. The Commission continues to meet with neighborhood groups and organizations on a regular basis to address matters under its purview.

The City has received substantial funding from the federal government and the Commonwealth of Massachusetts over the years, and has extensive experience administering projects similar in scope and complexity to the Project proposed herein. In 2006-2007, LACCM subcontracted with the City of Worcester in connection with a PEI grant (No. FH700G05089), and since February 2008 LACCM has again subcontracted with the City in connection with LACCM's current PEI grant (No. FH700G07055). Under these grants, the City has assisted LACCM with outreach and intake for victims of housing discrimination in Worcester, particularly in the Latino community.

The Project will use compensation received from FHIP-funded enforcement activities as Program Income to further fair housing activities pursuant to 24 CFR 84.24 (b)(2). Every member of the Project keeps contemporaneous timesheets so that work done on FHIP-funded cases and activities is easily and accurately identified. Income received related to any of these FHIP cases is then segregated in LACCM's accounting system using a sub-account segment that identifies FHIP Program Income.

# JUSTICE.

11 Beacon Street • Suite 820 • Boston, Massachusetts 02108-3009 • phone: 617.367.8544 • fax: 617.367.8815

1 July 2008

[REDACTED] Executive Director,  
Legal Assistance Corporation of Central Massachusetts  
405 Main St.  
Worcester, Massachusetts. 01608

Re: Worcester Fair Housing Project

Dear [REDACTED]

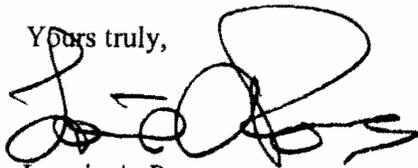
As the Executive Director of the Massachusetts Legal Assistance Corporation (MLAC), I write to confirm MLAC's commitment of matching funds, in the amount of [REDACTED] to support fair housing enforcement activities that will be carried out by the Worcester Fair Housing Project. The activities are outlined in the application of the Legal Assistance Corporation of Central Massachusetts (LACCM) for a United States Department of Housing and Urban Development FHIP/PEI General Component grant.

MLAC is the largest funding source for civil legal aid programs in Massachusetts. Established by the Massachusetts Legislature in 1983 to ensure that low-income people with civil legal problems would have access to legal information, advice and representation, MLAC annually allocates funds to LACCM based on the percentage of low-income Massachusetts residents in Worcester County, LACCM's service area.

I have the authority to commit matching funds in the amount of [REDACTED] to LACCM for the activities outlined in LACCM's Statement of Work, including but not limited to activities related to investigation, testing, enforcement, outreach and training. The timeline for this commitment of funds will be consistent with the corresponding grant period.

Please feel free to contact me with any questions. Thank you.

Yours truly,



Lonnie A. Powers

## AFFIRMATIVELY FURTHERING FAIR HOUSING STATEMENT

The Worcester Fair Housing Project will perform investigation and enforcement activities designed to prevent or eliminate practices adversely affecting the achievement of the goal of fair housing. As is more fully discussed in Factor 2 of this application, local Analyses of Impediments to Fair Housing Choice (“AI”) identify several barriers to the fulfillment of this goal. The City of Worcester’s AI calls for a more regional effort to provide affordable housing so that minority, low-income families are not concentrated in the central city, and acknowledges that families with young children face barriers to finding housing because units contain lead paint. The City of Fitchburg’s AI reports discrimination against people of color, homeless people, and families with children, and recommends that the City improve housing choice by conducting educational forums about fair housing for the public. The Massachusetts Department of Housing and Community Development’s AI lists several factors that deter victims of housing discrimination from filing complaints, including perceived futility, fear of retaliation, the subtlety of many discriminatory practices, and insufficient awareness about the availability of advocacy and testing services. As is more fully described in Factors 2, 3 and 5, the Project’s experienced team of attorneys and outreach workers will overcome these barriers by engaging in outreach and education activities to victims of housing discrimination, housing providers, and public officials; by running a comprehensive testing program; and by litigating meritorious cases in administrative forums and in state and federal court. The expected long-term results of these efforts will include increasing community awareness of the law, providing an easily-accessed intake and complaint system, and reducing the incidences of housing discrimination in central Massachusetts.

# Grant Application Detailed Budget Worksheet

OMB Approval No. 2501-0017

(Exp. 01/31/2008)

Name and Address of Applicant:

**Legal Assistance Corp. of Central Mass.**

**405 Main St., 4th Floor**

**Worcester, MA 01608**

**PEI 2008**

**Category**

Public reporting burden for this collection of information is estimated to average 3 hours 12 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number. Information collected will provide proposed budget data for multiple programs. HUD will use this information in the selection of applicants. Response to this request for information is required in order to receive the benefits to be derived. The information requested does not lend itself to confidentiality.

**Detailed Description of Budget (for full grant period)**

1. Personnel (Direct Labor) Position or Individual	Estimated Hours	Rate per Hour	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Program Manager	1,638	\$33.24	\$54,447	\$35,371							
Executive Director	91	\$49.45	\$4,500	\$3,006							
Senior Attorney	91	\$57.69	\$5,250	\$3,507							
Staff Attorney	1,820	\$25.275	\$46,000	\$30,728							
Staff Attorney	364	\$25.82	\$9,398	\$6,278							
Outreach Paralegal	182	\$25.82	\$4,699	\$3,139							
Program Secretary	182	\$20.93	\$3,809	\$2,544							
Total Direct Labor Cost	728	\$20.87	\$15,193	\$10,149							
			<b>\$143,296</b>	<b>\$94,722</b>							
2. Fringe Benefits											
Employee Fringe Benefits	24.19%	Base	\$34,663	\$22,913							
Total Fringe Benefits Cost											
3. Travel											
Total Fringe Benefits Cost			<b>\$34,663</b>	<b>\$22,913</b>							
3a. Transportation - Local Private Vehicle											
Employee transportation	Mileage	Rate per Mile	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Tester transportation	2,000	\$0.585	\$1,170								
	2,000	\$0.585	\$1,170								
Subtotal - Trans - Local Private Vehicle			\$2,340	\$0							

# Grant Application Detailed Budget Worksheet

## Detailed Description of Budget

3b. Transportation - Airfare (show destination)	Trips	Fare	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
HUD Required Training Travel - Location unknown, use Washington DC as example.	5	\$423.00	\$2,115	\$2,115							
Subtotal - Transportation - Airfare											
			\$2,115	\$2,115	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3c. Transportation - Other	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
HUD Required Training Travel - Location unknown, use Washington DC as example.	5	\$182.00	\$910	\$910							
Subtotal - Transportation - Other											
			\$910	\$910	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3d. Per Diem or Subsistence (Indicate location)	Days	Rate per Day	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
HUD Required Training Travel - Location unknown, use Washington DC as example.	15	\$265.00	\$3,975	\$3,975							
Subtotal - Per Diem or Subsistence											
			\$3,975	\$3,975	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4. Equipment (Only items over \$5,000 Depreciated value)	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Total Equipment Cost											
			\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

# Grant Application Detailed Budget Worksheet

## Detailed Description of Budget

5. Supplies and Materials (Items under \$5,000 Depreciated Value)												
5a. Consumable Supplies	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income	
Subtotal - Consumable Supplies			\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
5b. Non-Consumable Materials	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income	
Subtotal - Non-Consumable Materials			\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
<b>Total Supplies and Materials Cost</b>			<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	
6. Consultants (Type)	Days	Rate per Day	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income	
Total Consultants Cost			\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
7. Contracts and Sub-Grantees (List individually)	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income	
City of Worcester / Office of Human Rights	1	\$48,325	\$48,325	\$35,929	\$0	\$0	\$0	\$0	\$0	\$12,396	\$0	
<b>Total Subcontracts Cost</b>			<b>\$48,325</b>	<b>\$35,929</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$12,396</b>	<b>\$0</b>	



# Grant Application Detailed Budget Worksheet

8f. Project inspection fees	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Project inspection fees			\$0								
8g. Site work	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Site work			\$0								
8h. Demolition and removal	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Demolition and removal			\$0								
8i. Construction	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Construction			\$0								
8j. Equipment	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Equipment			\$0								
8k. Contingencies	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Contingencies			\$0								
8l. Miscellaneous	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Miscellaneous			\$0								
<b>Total Construction Costs</b>			<b>\$0</b>		<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

# Grant Application Detailed Budget Worksheet

9. Other Direct Costs		Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other City of Worcester	Program Income
Testers - complete tester training		20	\$ 50.00	\$1,000								
Testers - complete testing (50 paired tests)		100	\$ 20.00	\$2,000	\$668							
Design, translate, print & distribute posters		100	\$ 4.00	\$400	\$1,336							
Design, translate, print & distribute brochures		5,000	\$ 0.235	\$1,175	\$267							
Total Other Direct Costs				\$4,575	\$3,056							
Subtotal of Direct Costs				\$240,199	\$163,620		\$0	\$0	\$0	\$0	\$12,396	\$0
10. Indirect Costs												
Approved indirect cost base includes first \$25,000 of sub-recipient costs		44.79%	\$216,874	\$97,138	\$68,380		\$0	\$0	\$0	\$0	\$0	\$0
Total Indirect Costs				\$97,138	\$68,380		\$0	\$0	\$0	\$0	\$0	\$0
Total Estimated Costs				\$337,337	\$232,000		\$0	\$0	\$0	\$0	\$12,396	\$0

**Grant Applications  
Detailed Budget**

U.S. Department of Housing  
and Urban Development

OMB Approval No. 2501-0017  
(expires 01/31/2008)

Close Form

Print Page

About

\* Organization Name: Legal Assistance Corporation of Central Massachusetts

\* Project/Activity Name:

Worcester Fair Housing Project

	Functional Categories								
	Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9
	HUD Share (\$)	Applicant Match (\$)	Other HUD Funds (\$)	Other Fed Share (\$)	State Share (\$)	Local/Tribal Share (\$)	Other Share (\$)	Program Income (\$)	Total (\$)
a. Personnel (Direct Labor)	94,722.00								
b. Fringe Benefits	22,913.00								
c. Travel	7,000.00								
d. Equipment (only items > \$5,000 depreciated value)									
e. Supplies (only items < \$5,000 depreciated value)									
f. Contractual	35,929.00								
g. Construction									
1. Administration and Legal Expenses									
2. Land, Structures, Rights-of-Way, Appraisals, etc.									
3. Relocation Expenses and Payments									
4. Architectural and Engineering Fees									
5. Other Architectural and Engineering Fees									
6. Project Inspection Fees									
7. Site Work									
8. Demolition and Removal									
9. Construction									
10. Equipment									
11. Contingencies									
12. Miscellaneous									
h. Other Direct Costs	3,056.00								
i. Subtotal of Direct Costs	163,620.00								
j. Indirect Costs (% Approved Indirect Cost Rate: 44.79%)									
Grand Total (Year 1):									
Grand Total (All Years):									

Next Year

## ATTACHMENTS FORM

**Instructions:** On this form, you will attach the various files that make up your grant application. Please consult with the appropriate Agency Guidelines for more information about each needed file. Please remember that any files you attach must be in the document format and named as specified in the Guidelines.

**Important:** Please attach your files in the proper sequence. See the appropriate Agency Guidelines for details.

1) Please attach Attachment 1	ProjectAbstract.doc	Add Attachment	Delete Attachment	View Attachment
2) Please attach Attachment 2	AffirmativelyFurtheringStatem	Add Attachment	Delete Attachment	View Attachment
3) Please attach Attachment 3	Factor1.doc	Add Attachment	Delete Attachment	View Attachment
4) Please attach Attachment 4	Factor2.doc	Add Attachment	Delete Attachment	View Attachment
5) Please attach Attachment 5	Factor3.doc	Add Attachment	Delete Attachment	View Attachment
6) Please attach Attachment 6	StatementofWork.doc	Add Attachment	Delete Attachment	View Attachment
7) Please attach Attachment 7	HUD424CBWLACCM.xls	Add Attachment	Delete Attachment	View Attachment
8) Please attach Attachment 8	HUD424CBWCity.xls	Add Attachment	Delete Attachment	View Attachment
9) Please attach Attachment 9	NarrativeBudgetWorkplan.doc	Add Attachment	Delete Attachment	View Attachment
10) Please attach Attachment 10	Factor4.doc	Add Attachment	Delete Attachment	View Attachment
11) Please attach Attachment 11	LetterofFirmCommitmentMLAC.pdf	Add Attachment	Delete Attachment	View Attachment
12) Please attach Attachment 12	LetterofFirmCommitmentCity.pdf	Add Attachment	Delete Attachment	View Attachment
13) Please attach Attachment 13	Factor5LogicModel.xls	Add Attachment	Delete Attachment	View Attachment
14) Please attach Attachment 14	HUDForm27061.pdf	Add Attachment	Delete Attachment	View Attachment
15) Please attach Attachment 15	CodeofConduct.doc	Add Attachment	Delete Attachment	View Attachment

# Survey on Ensuring Equal Opportunity For Applicants

OMB No. 1890-0014 Exp. 2/28/2009

## Purpose:

The Federal government is committed to ensuring that all qualified applicants, small or large, non-religious or faith-based, have an equal opportunity to compete for Federal funding. In order for us to better understand the population of applicants for Federal funds, we are asking nonprofit private organizations (not including private universities) to fill out this survey.

Upon receipt, the survey will be separated from the application. Information provided on the survey will not be considered in any way in making funding decisions and will not be included in the Federal grants database. While your help in this data collection process is greatly appreciated, completion of this survey is voluntary.

## Instructions for Submitting the Survey

If you are applying using a hard copy application, please place the completed survey in an envelope labeled "Applicant Survey." Seal the envelope and include it along with your application package. If you are applying electronically, please submit this survey along with your application.

Applicant's (Organization) Name:	Legal Assistance Corporation of Central Massachusetts
Applicant's DUNS Name:	[REDACTED]
Federal Program:	Fair Housing Initiative Program - PEI
CFDA Number:	14.408

- Has the applicant ever received a grant or contract from the Federal government?
 

Yes       No
- Is the applicant a faith-based organization?
 

Yes       No
- Is the applicant a secular organization?
 

Yes       No
- Does the applicant have 501(c)(3) status?
 

Yes       No
- Is the applicant a local affiliate of a national organization?
 

Yes       No
- How many full-time equivalent employees does the applicant have? (Check only one box).
 

3 or Fewer       15-50

4-5       51-100

6-14       over 100
- What is the size of the applicant's annual budget? (Check only one box.)
 

Less Than \$150,000

\$150,000 - \$299,999

\$300,000 - \$499,999

\$500,000 - \$999,999

\$1,000,000 - \$4,999,999

\$5,000,000 or more

**Survey Instructions on Ensuring Equal Opportunity for Applicants**

OMB No. 1890-0014 Exp. 2/28/2009

Provide the applicant's (organization) name and DUNS number and the grant name and CFDA number.

1. Self-explanatory.
2. Self-identify.
3. Self-identify.
4. 501(c)(3) status is a legal designation provided on application to the Internal Revenue Service by eligible organizations. Some grant programs may require nonprofit applicants to have 501(c)(3) status. Other grant programs do not.
5. Self-explanatory.
6. For example, two part-time employees who each work half-time equal one full-time equivalent employee. If the applicant is a local affiliate of a national organization, the responses to survey questions 2 and 3 should reflect the staff and budget size of the local affiliate.
7. Annual budget means the amount of money your organization spends each year on all of its activities.

**Paperwork Burden Statement**

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this

information collection is **1890-0014**. The time required

to complete this information collection is estimated to average five (5) minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection.

**If you have any comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to:** The Agency Contact listed in this grant application package.

America's Affordable Communities  
Initiative

U.S. Department of Housing  
and Urban Development

OMB approval no. 2510-0013  
(exp. 03/31/2010)

\* Organization Name:

Legal Assistance Corporation of Central Massachusetts

### Questionnaire for HUD's Initiative on Removal of Regulatory Barriers

#### Part A. Local Jurisdictions. Counties Exercising Land Use and Building Regulatory Authority and Other Applicants Applying for Projects Located in such Jurisdictions or Counties [Collectively, Jurisdiction]

	1	2
1. Does your jurisdiction's comprehensive plan (or in the case of a tribe or TDHE, a local Indian Housing Plan) include a "housing element"? A local comprehensive plan means the adopted official statement of a legislative body of a local government that sets forth (in words, maps, illustrations, and/or tables) goals, policies, and guidelines intended to direct the present and future physical, social, and economic development that occurs within its planning jurisdiction and that includes a unified physical plan for the public development of land and water. If your jurisdiction does not have a local comprehensive plan with a "housing element," please enter no. If no, skip to question # 4.	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
2. If your jurisdiction has a comprehensive plan with a housing element, does the plan provide estimates of current and anticipated housing needs, taking into account the anticipated growth of the region, for existing and future residents, including low, moderate and middle income families, for at least the next five years?	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
3. Does your zoning ordinance and map, development and subdivision regulations or other land use controls conform to the jurisdiction's comprehensive plan regarding housing needs by providing: a) sufficient land use and density categories (multifamily housing, duplexes, small lot homes and other similar elements); and, b) sufficient land zoned or mapped "as of right" in these categories, that can permit the building of affordable housing addressing the needs identified in the plan? (For purposes of this notice, "as-of-right," as applied to zoning, means uses and development standards that are determined in advance and specifically authorized by the zoning ordinance. The ordinance is largely self-enforcing because little or no discretion occurs in its administration.). If the jurisdiction has chosen not to have either zoning, or other development controls that have varying standards based upon districts or zones, the applicant may also enter yes.	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
4. Does your jurisdiction's zoning ordinance set minimum building size requirements that exceed the local housing or health code or is otherwise not based upon explicit health standards?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

<p>5. If your jurisdiction has development impact fees, are the fees specified and calculated under local or state statutory criteria? If no, skip to question #7. Alternatively, if your jurisdiction does not have impact fees, you may enter yes.</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
<p>6. If yes to question #5, does the statute provide criteria that sets standards for the allowable type of capital investments that have a direct relationship between the fee and the development (nexus), and a method for fee calculation?</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>7. If your jurisdiction has impact or other significant fees, does the jurisdiction provide waivers of these fees for affordable housing?</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>8. Has your jurisdiction adopted specific building code language regarding housing rehabilitation that encourages such rehabilitation through graduated regulatory requirements applicable as different levels of work are performed in existing buildings? Such code language increases regulatory requirements (the additional improvements required as a matter of regulatory policy) in proportion to the extent of rehabilitation that an owner/developer chooses to do on a voluntary basis. For further information see HUD publication: "Smart Codes in Your Community: A Guide to Building Rehabilitation Codes" (<a href="http://www.huduser.org/publications/destech/smartcodes.html">www.huduser.org/publications/destech/smartcodes.html</a>)</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>9. Does your jurisdiction use a recent version (i.e. published within the last 5 years or, if no recent version has been published, the last version published) of one of the nationally recognized model building codes (i.e. the International Code Council (ICC), the Building Officials and Code Administrators International (BOCA), the Southern Building Code Congress International (SBCI), the International Conference of Building Officials (ICBO), the National Fire Protection Association (NFPA)) without significant technical amendment or modification? In the case of a tribe or TDHE, has a recent version of one of the model building codes as described above been adopted or, alternatively, has the tribe or TDHE adopted a building code that is substantially equivalent to one or more of the recognized model building codes?</p> <p>Alternatively, if a significant technical amendment has been made to the above model codes, can the jurisdiction supply supporting data that the amendments do not negatively impact affordability?</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
<p>10. Does your jurisdiction's zoning ordinance or land use regulations permit manufactured (HUD-Code) housing "as of right" in all residential districts and zoning classifications in which similar site-built housing is permitted, subject to design, density, building size, foundation requirements, and other similar requirements applicable to other housing that will be deemed realty, irrespective of the method of production?</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes

<p>11. Within the past five years, has a jurisdiction official (i.e., chief executive, mayor, county chairman, city manager, administrator, or a tribally recognized official, etc.), the local legislative body, or planning commission, directly, or in partnership with major private or public stakeholders, convened or funded comprehensive studies, commissions, or hearings, or has the jurisdiction established a formal ongoing process, to review the rules, regulations, development standards, and processes of the jurisdiction to assess their impact on the supply of affordable housing?</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
<p>12. Within the past five years, has the jurisdiction initiated major regulatory reforms either as a result of the above study or as a result of information identified in the barrier component of the jurisdiction's "HUD Consolidated Plan?" If yes, attach a brief list of these major regulatory reforms.</p> <p><i>(If you have attachments that are electronic files please scroll to bottom of page 5 and attach. For information that is not in an electronic format use the eFax method. See the General Section Instructions for eFaxing.)</i></p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>13. Within the past five years has your jurisdiction modified infrastructure standards and/or authorized the use of new infrastructure technologies (e.g. water, sewer, street width) to significantly reduce the cost of housing?</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>14. Does your jurisdiction give "as-of-right" density bonuses sufficient to offset the cost of building below market units as an incentive for any market rate residential development that includes a portion of affordable housing? (As applied to density bonuses, "as of right" means a density bonus granted for a fixed percentage or number of additional market rate dwelling units in exchange for the provision of a fixed number or percentage of affordable dwelling units and without the use of discretion in determining the number of additional market rate units.)</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
<p>15. Has your jurisdiction established a single, consolidated permit application process for housing development that includes building, zoning, engineering, environmental, and related permits? Alternatively, does your jurisdiction conduct concurrent, not sequential, reviews for all required permits and approvals?</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>16. Does your jurisdiction provide for expedited or "fast track" permitting and approvals for all affordable housing projects in your community?</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>17. Has your jurisdiction established time limits for government review and approval or disapproval of development permits in which failure to act, after the application is deemed complete, by the government within the designated time period, results in automatic approval?</p>	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
<p>18. Does your jurisdiction allow "accessory apartments" either as: a) a special exception or conditional use in all single-family residential zones or, b) "as of right" in a majority of residential districts otherwise zoned for single-family housing?</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>19. Does your jurisdiction have an explicit policy that adjusts or waives existing parking requirements for all affordable housing developments?</p>	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
<p>20. Does your jurisdiction require affordable housing projects to undergo public review or special hearings when the project is otherwise in full compliance with the zoning ordinance and other development regulations?</p>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<p>Total Points:</p>		