

Lunenburg Trust Fund Commission

Bilotta Meeting Room/PACC

Lunenburg Town Hall

February 12, 2026

The meeting was called to order at 5:01 pm by Chairman Bowen. Present were Mr Howard and Chairman Bowen.

Members recited the Pledge of Allegiance. Chairman Bowen proceeded to read the posted Agenda.

No public present. No public comment. No public on Zoom. No comment from members of the Trust Fund Commission. No Treasurer or Finance Director reports.

There were no representatives from any Trust Funds.

Follow up on need for warrant article. Chairman Bowen has new information and updated his document, a Warrant article will be submitted to the Board of Selectmen and the Town Manager, a bylaw will be presented to the bylaw review committee. On March 3rd Chairman Bowen is scheduled to make a presentation to the Select Board. Chairman Bowen will be meeting with Town Counsel on the cy pres filing, which will be tied to a warrant article.

The Board reviewed a draft of the Guide for Military distributed through the American Legion funds that was prepared by Chairman Bowen. This draft wording defines the eligibility determination process as soon as cy pres filing is done. Text is as follows:

Trust Fund disbursement Eligibility Instruction Manual

For the Trustees of the Lunenburg, Massachusetts Board of Trust Fund Commissioners

Table of Contents

1. Purpose & Scope

This manual guides Trustees through a consistent, auditable process to determine eligibility for disbursements from Military Personnel-Related Trust Funds. It focuses on discharge types (punitive and misconduct-based administrative) and the DD-214 fields required to make determinations.

2. Definitions

Punitive discharges: Dishonorable Discharge, Bad Conduct Discharge (BCD), and Dismissal (officers) imposed only by court-martial.

Administrative discharges: Honorable, General (Under Honorable Conditions), Other Than Honorable (OTH), and Entry-Level (Uncharacterized).

DD-214 Blocks: Key fields: #24 Character of Service; #25 Separation Authority; #26 SPD Code; #28 Narrative Reason.

3. Step-by-Step Eligibility Determination Process

1. Obtain the applicant's DD-214 (long form).
2. Record the Character of Service (Block 24).
3. Record the Narrative Reason (Block 28).
4. Record the Separation Authority (Block 25).
5. Record the SPD Code (Block 26).
6. Screen for restrictive categories: any Dishonorable, BCD, Dismissal, and most OTH tied to misconduct; flag for verification.
7. If flagged, verify the SPD code with the Service authority (Army S-1/Transition; Navy PSD/PERS-832; Air Force/Space Force MPF; Marine Corps IPAC; Coast Guard SPO/PPC).
8. Document the verification (email or memo to file) and attach to the case.
9. Apply Board policy and make a final determination; record the decision and rationale.

4. Documentation & Recordkeeping

Maintain the DD-214 copy, SPD verification proof, and the Board's written decision in the case file.

5. Appeals & Exceptions

Applicants may request reconsideration with new documentation; Trustees may refer complex cases for legal counsel review.

Appendices

Appendix A — Discharge & SPD Overview by Branch

Note: SPD codes are controlled by DoD/Services and are not fully published. Public SPD lists are provided as screening cues only. Always verify the actual code on the DD-214 with the Service personnel office before making a determination.

A.1 U.S. Army

Category	Discharge Type	Characterization	Narrative Reason (examples)	Separation Authority on DD-214 (Block 25)	SPD Code(s) & Source	Notes
Punitive	Bad Conduct / Dishonorable / Dismissal (officers)	Punitive	Court-martial sentence	AR 635-200, ch. 3	GJB (Court-Martial) — Public; verify with S-1/Transition	AR 635-5-1 SPD list is FOUO; confirm official code
Administrative —Misconduct	Pattern of Misconduct	Often OTH or General	Pattern of Misconduct	AR 635-200, chap. 14	BKA — Public; verify	Screening cue only
Administrative —Misconduct	Serious Offense	Often OTH or General	Commission of a Serious Offense	AR 635-200, chap. 14	BKQ — Public; verify	Screening cue only
Administrative —Misconduct	Drug Abuse	Often OTH or General	Drug Abuse/Drug Use	AR 635-200, chap. 14	BKK — Public; verify	Screening cue only
Administrative —Misconduct	Civil Conviction	Often OTH or General	Civilian Conviction	AR 635-200, chap. 14	BKB — Public; verify	Screening cue only

A.2 U.S. Navy

Category	Discharge Type	Characterization	Narrative Reason (examples)	Separation Authority on DD-214 (Block 25)	SPD Code(s) & Source	Notes
Punitive/Quasi-punitive	Separation in Lieu of Trial by Court-Martial (SILTBCM)	Usually OTH (case-dependent)	In lieu of trial by court-martial	MILPERSMAN 1910-106	SPD per BUPERSINST 1900.8D — verify with PSD	Honorable not authorized under 1910-106
Administrative—Misconduct	Commission of a Serious Offense	Often OTH or General	Serious Offense	MILPERSMAN 1910-142	Verify with PSD	Admin board if OTH contemplated

Administrative—Misconduct	Drug Abuse	Often OTH or General	Drug Abuse/Misuse	MILPERSMAN 1910-146	Verify with PSD	Notification vs Board affects least-favorable characterization
Administrative—Misconduct	Pattern of Misconduct	Often OTH or General	Pattern of Misconduct	MILPERSMAN 1910-140	Verify with PSD	Admin board if OTH
Administrative—Misconduct	Civilian Conviction	Often OTH or General	Civilian Conviction	MILPERSMAN 1910-144	Verify with PSD	
Reference Example (not restrictive)	EAOS / Completion of Active Service	Honorable/General	EAOS	MILPERSMAN 1910-104	JBK/KBK/LBK/MBK (published in article)	Published Navy SPD example

A.3 U.S. Air Force / U.S. Space Force

Category	Discharge Type	Characterization	Narrative Reason (examples)	Separation Authority on DD-214 (Block 25)	SPD Code(s) & Source	Notes
Punitive	Bad Conduct / Dishonorable / Dismissal (officers)	Punitive	Court-martial sentence	DAFI 36-3202 (DD-214 procedures); UCMJ	Controlled SPD list — verify with MPF	Confirm SPD/narrative with MPF
Administrative—Misconduct	Misconduct (various)	Often OTH or General	Serious Offense / Pattern / Drug Abuse	DAFI 36-3211 & DoDI 1332.14; DAFI 36-3202	Controlled SPD list — verify with MPF	Public codes are cues only

A.4 U.S. Marine Corps

Category	Discharge Type	Characterization	Narrative Reason (examples)	Separation Authority on DD-214 (Block 25)	SPD Code(s) & Source	Notes
Punitive	Bad Conduct / Dishonorable / Dismissal (officers)	Punitive	Court-martial sentence	MCO 1900.16 (MARCORSEPMAN)	SPD tables removed from public manual — verify with IPAC	Confirm via unit IPAC/Manpower

Administrative —Misconduct	Serious Offense / Drug Abuse / Pattern	Often OTH or General	Serious Offense / Drug Abuse / Pattern	MCO 1900.16 (MARCORSEP MAN)	Use public SPD codes (e.g., BKA/BKQ/BK K) as cues; verify
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A.5 U.S. Coast Guard

Category	Discharge Type	Characteriza tion	Narrative Reason (examples)	Separation Authority on DD-214 (Block 25)	SPD Code(s) & Source	Notes
Punitive/Ad min	Court-martial / Misconduct (various)	Punitive or OTH/General	Court-martial ; Serious Offense; etc.	COMDTINST 1900.4F (DD-214); COMDTINST 1000.4C (Separations)	Aligned to DoD SPD codes — verify with SPO/PPC	ALCOAST 027/26 confirms alignment update

Appendix B — SPD Verification Workflow & Contacts

1. Confirm DD-214 is the long form; ensure Blocks 24–28 are present.
2. If discharge is Dishonorable/BCD/Dismissal or OTH tied to misconduct, initiate SPD verification.
3. Contact the appropriate Service office: Army S-1/Transition; Navy PSD/PERS-832; Air Force/Space Force MPF; Marine Corps IPAC/Manpower; Coast Guard SPO/PPC.
4. Request written/email confirmation of the SPD meaning and the narrative reason.
5. Attach the confirmation to the case file and proceed with determination.

Appendix C — Sample DD-214 Reference (Key Blocks)

Use this table to locate information for screening. (This is a simplified reference layout; official DD-214 formatting may differ.)

Block	Field Name	What Appears	How the Board Uses It
23	Type of Separation	e.g., Discharge/Release	Context only
24	Character of Service	Honorable / General (UHC) / OTH / BCD / Dishonorable / Dismissal	Primary screening; restrictive if Dishonorable, BCD, Dismissal; OTH flagged

25	Separation Authority	Governing reg (e.g., AR 635-200 ch. 3; MILPERSMAN 1910-142)	Corroborates reason/branch guidance
26	Separation Code (SPD)	3-letter code (controlled by Service)	Verify with Service office if restrictive
27	Reentry Code	RE-code	Informational
28	Narrative Reason	Plain-language reason (e.g., “Misconduct—Serious Offense”)	Secondary screening, aligns with authority & SPD
29	Dates of Time Lost	If any	Informational

Lunenburg, MA – Board of Trust Fund Commissioners
Trust Fund Disbursement Eligibility Instruction Manual

For the Trustees of the Lunenburg, Massachusetts Board of Trust Fund Commissioners

Appendix D: Sample DD-214 (Long Form)

1. Enter the full legal name in Block 1.
2. Specify the branch/component in Block 2.
3. Select the appropriate Character of Service in Block 24.
4. Record the proper Separation Authority in Block 25.
5. Enter the correct SPD Code in Block 26.
6. Provide the specific Narrative Reason for separation in Block 28.
7. Complete any additional blocks as required.
8. Review all entries to ensure accuracy and completeness.

Appendix E: Sample DD-214 (Short Form)

1. Enter the full legal name in Block 1.
2. Specify the branch/component in Block 2.
3. Select the appropriate Character of Service in Block 24.
4. Record the Date Entered Active Duty in Block 12a.
5. Enter the Separation Date in Block 12b.
6. Review the short form summary for essential information, and verify accuracy.

Notice: This manual and appendices are an overview to assist the Trustees of the Lunenburg, Massachusetts Board of Trust Fund Commissioners. Final eligibility decisions rest with the Board’s policy and the official DD-214 on file. Always verify SPD codes with the issuing Service.

Since members of the Board of Trust Fund Commissioners do not have access to the systems required to validate eligibility, verification of DD-214 information will need to be performed by Michelle Durkey, Veteran's Service Agent mdurkey@lunenburgma.gov. DD214 long form.

We will only disclose when we deny the application without the specific reasons.

Chairman Bowen made a motion to approve the Trust Fund disbursement eligibility instruction manual for Veteran's Trust Funds that the Town may come in control, that if the fund does not specifically state that these circumstances are not a disqualifier then they shall be applied to all veteran trust funds given or bequeathed in the benefit of the town and its residents. Mr Howard seconded the motion as worded. Motion was passed with Chairman Bowen voting 'aye' and Mr Howard voting 'aye'

Chairman Bowen made a motion to adopt the policy for the management and distribution of donated Trust Funds, written by the board of Trust Fund Commissioners with the exception of section 14 unless and until it is ratified at annual Town Meeting. If ratified at Town Meeting, it shall be incorporated into this document by order and directive of Town Meeting. Mr Howard seconded the motion. Vote on motion was Mr Howard = aye, Chairman Bowen = aye.

The next document that was reviewed during the meeting was the Income eligibility policy for Poor Funds. Text is as follows.

Trust Fund Disbursement Eligibility Instruction Manual

For the Trustees of the Lunenburg, Massachusetts Board of Trust Fund Commissioners

Table of Contents

Purpose & Scope

This manual establishes uniform criteria and procedures for Trust Fund eligibility determinations including income, residency, FPL application, documentation, and appeals.

Definitions

%FPL: income divided by 100% FPL monthly

Federal Poverty Level: HHS guideline

Gross Monthly Income: income before taxes

Household Size: all persons sharing income

Step-by-Step Eligibility Determination

- Finalize decision

- Check duplication
- Determine loan terms
- Apply sliding-scale policy
- Calculate %FPL
- Find 100% FPL
- Collect gross income
- Determine household size
- Verify United States Residency (Residency Requirement)
- Intake

Documentation & Recordkeeping

Retain application, proofs, income docs, FPL worksheet, decision, notes for 6 years per MA law.

Appeals & Exceptions

Applicant, may appeal in 30 days; board reviews evidence and issues decision; exceptions for hardship.

1. Commissioners' Instructional Process — Determining Eligibility Across All Criteria

1. Residency & Identity: Verify Massachusetts and Lunenburg and United States residency and identity for all adult household members.
2. Household Size: Confirm all persons sharing income/expenses; document dependents.
3. Income: Capture **gross monthly income** from all sources (wages, unemployment, Social Security, child support).
4. Federal Poverty Level: Use **2026 HHS FPG** for the 48 states to compute **%FPL**; monthly = annual ÷ 12. (See Appendices B/C.)
5. Assets/Resources (if program requires): Record liquid assets if relevant to a specific fund rule.
6. Urgency/Use of Funds: Assess purpose (e.g., housing, utilities, medical, transportation) and whether other benefits are available.
7. Duplication of Benefits: Ensure Trust funds do not duplicate aid already provided for the same need.

8. Conflict Check: Commissioners with conflicts must recuse; note in minutes.

9. Decision & Documentation: Apply the Sliding-Scale schedule; set loan terms if applicable; record determination, amount, %FPL, and rationale.

Appendix B — MassHealth-Specific Poverty Percentage Charts (2026)

Family Size	133% Annual	138% Annual	200% Annual	250% Annual	300% Annual	400% Annual	133% Monthly	138% Monthly	200% Monthly	250% Monthly	300% Monthly	400% Monthly
1	\$21,227	\$22,025	\$31,920	\$39,900	\$47,880	\$63,840	\$1,769	\$1,835	\$2,660	\$3,325	\$3,990	\$5,320
2	\$28,781	\$29,863	\$43,280	\$54,100	\$64,920	\$86,560	\$2,398	\$2,489	\$3,607	\$4,508	\$5,410	\$7,213
3	\$36,336	\$37,702	\$54,640	\$68,300	\$81,960	\$109,280	\$3,028	\$3,142	\$4,553	\$5,692	\$6,830	\$9,107
4	\$43,890	\$45,540	\$66,000	\$82,500	\$99,000	\$132,000	\$3,658	\$3,795	\$5,500	\$6,875	\$8,250	\$11,000
5	\$51,444	\$53,378	\$77,360	\$96,700	\$116,040	\$154,720	\$4,287	\$4,448	\$6,447	\$8,058	\$9,670	\$12,893
6	\$58,999	\$61,217	\$88,720	\$110,900	\$133,080	\$177,440	\$4,917	\$5,101	\$7,393	\$9,242	\$11,090	\$14,787
7	\$66,553	\$69,055	\$100,080	\$125,100	\$150,120	\$200,160	\$5,546	\$5,755	\$8,340	\$10,425	\$12,510	\$16,680
8	\$74,108	\$76,894	\$111,440	\$139,300	\$167,160	\$222,880	\$6,176	\$6,408	\$9,287	\$11,608	\$13,930	\$18,573
Each Add Person	\$7,554	\$7,838	\$11,360	\$14,200	\$17,040	\$22,720	\$629	\$653	\$946	\$1,182	\$1,419	\$1,892

Appendix C — Fillable Worksheet for %FPL and Award Determination

Applicant Name:

Address & Municipality:

Phone / Email:

Household Size:

Gross Monthly Income (total):

100% FPL (Monthly) for household size (see Appendix B):

%FPL = Gross Income ÷ 100% FPL:

Sliding-Scale Tier (see Section 4):

Award Type & Amount (Grant/Loan split):

Commissioner Notes / Conditions:

Appendix D — Applicant Instructions (Detailed Guidance)

Applicants must follow all instructions carefully before submitting their packet.

Attach required proof of ID, residency, and income.

Incomplete applications may delay processing.

1. Complete all sections.
2. Attach MA town and United States residency proof.
3. Provide last 30 days income.
4. Provide documentation of need.
5. Sign and date the certification.

Appendix E — Applicant Packet (Form + Instructions)

****Instructions for Applicants**** (attach proof):

- 1) Complete all fields.
- 2) Attach ID and residency proof.
- 3) Attach last 30 days of income proof.
- 4) State purpose and amount.
- 5) Sign and date.
- 6) Submit to Board Clerk.

Applicant Full Name

Address (Street, City/Town, ZIP)

Phone / Email

Household Members (list names, DOB,
relationship)

Employer / Income Sources

Gross Monthly Income (total)

Purpose of Request (describe need)

Amount Requested

Other Assistance Received/Applied For (program
& amount)

Preferred Disbursement (vendor/landlord pay,
etc.)

Applicant Signature / Date

Intake Reviewer (Board/Clerk) / Date

Mr Howard requested that we add Citizenship/Residency to the requirements. Verify US legal residency.

A Motion was put forth by Chairman Bowen to adopt the trust fund disbursement eligibility instruction manual based on income for any fund for which the town holds of which income is the basis for the trust fund to utilize this particular format for determining eligibility. Motion was second by Mr Howard. Mr Howard vote = aye, Chairman Bowen =aye.

Chairman Bower reviewed the warrant article for the appropriation of funds for cy pres filings. The text of the proposed article is as follows:

Town of Lunenburg, Massachusetts
Annual Town Meeting – May 2, 2026
Warrant Article

**ARTICLE __: APPROPRIATION FOR LEGAL EXPENSES RELATED TO TRUST FUND
CY PRES PROCEEDINGS**

To see if the Town will vote to appropriate the sum of Fourteen Thousand Two Hundred Fifty-Two Dollars and Thirty-Nine Cents (\$14,252.39) from the General Fund for the payment of legal expenses, as advised by Town Counsel, necessary for the research, analysis, legal drafting, and filing of cy pres petitions in the Massachusetts Probate and Family Court, Worcester Division, for the purpose of correcting and updating the terms of certain trust funds so that they may lawfully and effectively serve their intended charitable purposes, including but not limited to:

1. The American Legion Poor Trust Fund (Ledger Name: American Legion Poor) and the Post 283 American Legion Trust Fund (Ledger Name: Lunenburg Post #283), which presently restrict use of funds to members of American Legion Post #283, an organization that is no longer an active or recognized National or State post of the American Legion, thereby preventing the funds from being used for the benefit of Lunenburg resident veterans; and

2. The Worthy Poor Fund (Ledger Name: Worthy Poor Income), whose existing terms require modification to conform with the modern structure of public assistance, as the responsibility for the care of the poor is no longer a municipal function and was assumed by the Commonwealth of Massachusetts in the early twentieth century under statewide public welfare laws;

said appropriation being for the purpose of restoring lawful, practical, and charitable use of these trust funds through judicial approval consistent with donor intent, or take any other action relative thereto.

Submitted by:

Board of Commissioners of Trust Funds

Prepared: January 29, 2026

Chairman Bowen read the text on the proposed warrant article that addresses the distribution of Trust Funds in the absence of a quorum. This will be presented to the Bylaw review committee.

Town of Lunenburg, Massachusetts
Annual Town Meeting – May 2, 2026
Warrant Article

ARTICLE __: DISTRIBUTION OF TRUST FUNDS IN THE ABSENCE OF A QUORUM

To see if the Town will vote to amend the General Bylaws of the Town of Lunenburg by adding a new section to Chapter 12, Boards, Commissions and Committees, designated as § 12-9, entitled 'Distribution of Trust Funds in the Absence of a Quorum,' to authorize the Select Board, on a limited and conditional basis, to approve distributions from trust funds only when the Board of Commissioners of Trust Funds lacks a lawful quorum, and further to establish specific voting requirements and safeguards applicable to such action, including: (i) a unanimous vote of all five Select Board members when only one elected member of the Board of Commissioners of Trust Funds remains in office; (ii) in the event of an emergency where unanimity is not possible, the temporary inclusion of that sole elected member of the

Board of Commissioners of Trust Funds as a voting participant, with approval by a majority of the Select Board members present; and (iii) conflict-of-interest and emergency fallback procedures, including reliance on the Rule of Necessity when legally required; all subject to strict compliance with donor intent, the governing trust instruments, existing policies of the Board of Commissioners of Trust Funds, and all applicable laws, or take any other action relative thereto.

Submitted by:

Board of Commissioners of Trust Funds

Discussed the document on the process for disbursement. Mr Howard felt this is an important provision to put in place as a safeguard to ensure continuity.

Chairman Bowen met with Myleen and went through records.

Will plan to review and approve past meeting minutes at the next meeting.

Chairman Bowen again discussed the vacancy on the Trust Fund Commission, urging viewers to join if they have the expertise to contribute.

Goals - no update on interns or real estate investigations.

No beneficiary comments.

The next scheduled meeting is for 2/26/26.

No comments from members of the Trust Fund Commissioners

Mr Howard put forth a motion to adjourn the meeting at 6:35pm, Chairman Bowen seconded the motion. The Motion was passed unanimously.