



November 6, 2023

Governor Maura Healey
Lieutenant Governor Kim Driscoll
Senate President Karen Spilka
Speaker of the House Ronald Mariano

Re: Recommendations for moving beyond the shelter emergency to better serve children and families

Dear Governor Healey, Lieutenant Governor Driscoll, Senate President Spilka, and Speaker Mariano:

On behalf of the Massachusetts Coalition for the Homeless (MCH), Massachusetts Law Reform Institute (MLRI), Citizens' Housing and Planning Association (CHAPA), the Moving Beyond the Emergency Working Group¹, and the undersigned organizations, we write to share our recommendations to help alleviate the acute Emergency Assistance (EA) shelter capacity crisis while upholding the safety, dignity, and stability of families most in need. We also urge the Legislature to provide adequate funding to maintain safe spaces for families eligible for EA shelter in the short-term, as meaningful solutions to the capacity crisis will take time to implement. We appreciate the work and commitment of both the Administration and Legislature in supporting families experiencing homelessness, and we stand ready to work together to implement family-focused solutions.

We ask the Administration and Legislature to adopt and support our recommendations in the following categories:

¹ The Moving Beyond the Emergency Working Group was first convened by MCH, MLRI, and CHAPA in early August to bring together advocates, providers, families, faith community members, and other stakeholders to provide recommendations and resources to help the Commonwealth address the current family homelessness crisis, uphold the right to shelter, and to chart a path forward towards greater service coordination, housing stability, and homelessness prevention. Through various meetings and communications, the working group has played a significant role in crafting the recommendations presented here.

1. Expanding available services for newly-arrived immigrant families and improve service coordination for all families experiencing homelessness
2. Helping families swiftly move out of Emergency Assistance and other temporary shelter programs into permanent affordable housing
3. Strengthening homelessness prevention resources to ensure that more families and individuals can maintain housing stability

These recommendations were crafted with two principles in mind: we must preserve and protect our family shelter system, and we must endeavor to provide safe and affordable housing for every family in Emergency Assistance shelter.

We know that expanding the EA shelter system cannot be the only solution. Massachusetts is experiencing a severe housing crisis. Our lowest income residents, including families in EA shelter, are increasingly unable to find or afford housing. We also know that homelessness, like housing instability, affects people of color disproportionately, with Black and Latine families overrepresented in the EA shelter program. In order to alleviate the shelter capacity crisis in a long-term, meaningful, and equitable way, we must make serious investments in finding safe, healthy, and affordable homes for families in crisis. We ask the Administration to adopt the following recommendations, while bringing key stakeholders to the table to uplift the experience and expertise of families and communities most affected by the crisis.

Recommendations

In order to alleviate the acute crisis we face, we must commit to addressing with urgency the three key categories outlined above: service availability and coordination, helping families exit shelter into permanent housing, and expanding homelessness prevention resources with urgency. In addition, there is a need for greater coordination within each category and among all three categories. We have been encouraged by the Administration's recent efforts to create a regional coordination structure and the appointment of Lieutenant General Rice as the Emergency Assistance Director. We hope to work with the Administration more closely to ensure these structures make the best and most efficient use of our many state, non-profit, municipal, and volunteer resources.

1. Expand available services for newly-arrived immigrant families and improve service coordination for all families experiencing homelessness.

The current shelter capacity challenge has placed renewed statewide focus on the EA system. This renewed focus, together with efforts to facilitate safe and permanent shelter exits, presents an opportunity to reimagine EA service delivery. Presently, EA providers, in addition to providing safe shelter sites for families, also offer a number of services aimed at helping each family find permanent, affordable housing and meet their educational and employment goals. Meeting our current challenges also will require targeted supports and services. For families fleeing violence and trauma who have newly arrived in the United States, critical additional services are necessary to ensure these families' mental health, medical, legal, and other needs are met so they can begin to rebuild. We urge the Administration to create a framework to provide these additional, targeted supports for newly-arrived immigrant families in EA shelter.

We recommend that the Administration first identify and take stock of the existing resources for supports and services across EA shelter locations, and then inventory the additional immigration-specific supports and services that are currently available. The Administration should work with stakeholders to identify which general supports still are needed across the EA shelter system, and which immigration-specific supports are needed (recognizing that some of these services, such as immigration-specific legal needs, may not be unique to new arrivals). We believe a regional approach to coordinating service providers would be most effective, and were encouraged that the Administration recently identified several Regional Coordinators to oversee regional implementation of services. We hope that the Regional Coordinators can begin to match services and needs in each region, in addition to serving as a single point of contact. This clarity is particularly important to ensuring that EA providers are able to provide core EA services, and are not using their limited resources to address immigration-specific needs.

As this framework is filled out, there will be an increasing need to distinguish between those services made available to all EA families in a certain region, such as those receiving services from a particular provider or at a central location, and those services that are individualized and must follow the family, such as specific, personalized medical care.

The purpose of creating an additional layer of immigration-specific services is to center families and avoid re-traumatization, ensure that EA providers are able to focus on providing EA services, and prevent duplication of services. Particularly as families are moved from one shelter location to another, the Regional Coordinators should be a reliable point of contact for a ‘receiving’ provider to get information about what services a family has already received and what more is needed, and to transfer key information. Either a secondary intake for immigration-specific needs, or a centralized database that is available to the Regional Coordinators that tracks what service providers a family is connected to, will be important to avoid duplication of effort by immigration-specific nonprofits as well as EA providers.

These EA and immigration-specific services require careful coordination.

We propose a coordination structure that is regionally focused, where real-time information can be shared across secretariats, and that can fully integrate the numerous organizations and individuals who are able to provide local services and supports. Since the time these recommendations were first drafted, the Administration has announced several encouraging changes consistent with our suggestions. We are grateful to see these actions from the Administration, and hope to learn more and work together to continue to improve these systems of coordination.

- **Designate a Central Coordinator.**

Designate a Central Coordinator atop a chain of command that includes Housing and Livable Communities, Health and Human Services, Office for Refugees and Immigrants, and other key state agencies, with authority to direct agency resources and personnel quickly and flexibly.

- **Designate Regional Coordinators.**

Designate Regional Coordinators to report directly to the central coordinator and meet regularly to assess local processes, resources, and troubleshoot issues. Each Regional Coordinator should have information about all EA and temporary shelter sites in their region, and:

- Serve as a single point of contact for municipalities, shelter providers, immigration service providers, regional planning agencies, nonprofit agencies, and volunteer groups
- Maintain regular contact with EA providers and the National Guard about daily placements and transfers

- Where there is no provider, be in regular contact with the municipality and nonprofit network where the shelter is located
 - Be available to provide real-time help to activate nonprofit network for specific needs
 - Be a central point of contact and location for receiving and distributing donations
- **Collaborate with local stakeholders.**
Regional Coordinators should work with local stakeholders (municipalities, providers, nonprofits, hospitals, etc.) and create a list of available resources, including a quick-activation phone tree for imminent needs. This phone tree can be activated when new sites are brought online to coordinate food, benefits, health care, interpretation, and other resources for families.

2. Facilitate Shelter Exits into Affordable Housing

As we grapple with the current shelter capacity crisis, it is crucial to preserve the principles of the right to shelter for families with children and create pathways for families to transition into safe, healthy, and affordable housing. Here are some immediate solutions that can be implemented with the existing resources and policies to ease the pressure on shelter providers by helping families move out of shelters and into stable housing.

- **Bring nearly 1,000 public housing units online and prioritize families in shelter.**
We applaud the Executive Office of Housing and Livable Communities' Vacancy Initiative to bring public housing apartments back online. By prioritizing people experiencing homelessness for these apartments, local housing authorities (LHAs) can be empowered to assist with the Emergency Assistance shelter crisis.
- **Use HomeBASE to support families and Local Housing Authorities.**
Using HomeBASE to help families move into public housing is an excellent use of this resource. Families will receive temporary assistance that transitions them into permanent affordable housing based on their incomes. For Housing Authorities that choose to participate, they will receive fair market rent for two years, providing them with support they need to staff and operate their buildings.

- **Expedite access to HomeBASE.**
Expedite HomeBASE processing time to allow for the relocation benefit can move families into stable housing quickly and efficiently.
- **Increase the funding for the Resident Service Coordinators program.**
Increase the funding for the existing Resident Service Coordinators (RSC) program so that LHAs can pay for full-time staffing rather than part-time staffing that many LHAs have today to help families moving in to access the services and supports they need.
- **Provide flexibility for LHA tenants to host families experiencing homelessness.**
Allow families in public housing to increase their household size on a temporary basis to allow other family members who are experiencing homelessness to stay with them without fear of penalty or eviction.
- **Work with affordable housing developers to identify additional housing opportunities.**
 - Many affordable housing owners are already part of the solution, offering homes to families exiting shelter. By setting a homelessness preference for project-based vouchers, which can be done on an alternating basis to ease the shelter pressures and continue to offer opportunities to people already on waitlists, we can help more families move out of shelter into long-term affordable housing.
 - Set a homelessness preference for tax credit apartments and add project-based Massachusetts Rental Voucher Program (MRVP) subsidies to bring rents to levels that families experiencing homelessness can afford.
 - Reach out to developers of large 40B developments to ask for market-rate apartments that can be rented to families with MRVP subsidies.
- **Target Massachusetts Rental Voucher Program (MRVP) subsidies and strengthen housing search.**
 - Target existing MRVP vouchers to families in shelters, along with other administrative changes to streamline and ease the application

and leasing processes, to allow families to move to stable housing in communities of their choice.

- Expedite the process of targeting MRVP vouchers with additional resources for Regional Administering Agencies to add capacity so that they can work with families in EA shelters and hotels to search for housing.
- Simplify the MRVP application process by allowing people on MassHealth to be deemed income-eligible without additional documentation of income.
- Allow shelter and service providers to enter into leases with property owners and to then sublease apartments to families with MRVP subsidies. This is an important incentive for property owners who have concerns about renting to households moving out of shelter.

- **Target Emergency Housing Vouchers to families in shelter.**

The United States Department of Housing and Urban Development's (HUD's) Emergency Housing Vouchers (EHVs) that are administered by the Local Housing Authorities and Continuums of Care could be leveraged to help families in shelters move to stable housing.

- **Expand access to vacant units through changes to inspection policies.**

For MRVP vouchers, allow inspections similar to Housing Quality Standards (HQS) inspections in lieu of Board of Health inspections to be performed by Regional Administering Agencies and compensate them for the inspections they conduct. MRVP units remain vacant across the state because municipalities do not have the capacity to conduct necessary inspections. Request waivers from HUD on Section 8 to allow inspections in occupied units. This will help families move into homes more quickly.

- **Leverage additional state resources.**

Identify and invest available state funds to expedite the development of new deeply affordable housing and supportive housing, particularly for projects that are stalled due to gaps in funding largely resulting from rising interest rates.

3. Invest and Improve Homelessness Prevention and Rehousing Programs

Now is the time to make deeper investments in homelessness prevention programs, move access upstream, and streamline access to these resources for families who otherwise would enter the EA program and for all residents in the Commonwealth facing homelessness.

We call on the Administration and Legislature to make it easier for families to access and retain rental assistance through the Residential Assistance for Families in Transition program (RAFT), HomeBASE, state-funded public housing, and related programs. By doing so, more families will be able to avoid entering shelter and stay stable in their existing homes.

- **Streamline access to the RAFT homelessness prevention program.**

When faced with widespread housing instability during the pandemic, the Commonwealth took important and meaningful steps to make it easier for people to apply for and receive emergency rental assistance. More recent changes to RAFT, such as requiring renters to have a notice to quit, prohibiting the use of RAFT for forward rent payments, and reducing the annual cap from \$10,000 per family per year to \$7,000, have made it more difficult. These changes need to be reversed in order to maximize housing stability.

- **Expand access to HomeBASE.**

We are grateful to the Administration and Legislature for making substantial improvements to the HomeBASE rehousing program. These changes include increasing the maximum HomeBASE benefit and extending the amount of time families can participate in the program. We urge you to continue to build on this progress by broadening HomeBASE eligibility to include families who otherwise would be imminently eligible for EA shelter. When families avoid entering shelter altogether, there will be more room for families that lack alternatives to Emergency Assistance.

Currently, very few families are able to successfully use HomeBASE as a diversion tool, i.e., before entering shelter. More families facing imminent evictions could access HomeBASE if the Executive Office of Housing and Livable Communities did not require families to have a firm move-out date

before being able to access HomeBASE diversion resources to try to stay in the very unit they are on the verge of losing. We urge HLC to provide HomeBASE diversion resources to families who otherwise meet the EA eligibility criteria in terms of family composition, income, and circumstances and can show that they would lose their existing apartment imminently without timely HomeBASE assistance.

- **Preserve existing public housing tenancies.**

We also encourage the Executive Office of Housing and Livable Communities to use their power and influence to encourage local housing authorities to minimize evictions from state-funded public housing units. Such efforts would decrease the number of new families and individuals entering homelessness, reserving evictions for only the most extreme cases.

We provide these recommendations in the spirit of cooperation. We share our gratitude for the difficult work of the Healey-Driscoll Administration and the Legislature to provide safe spaces for families in an unprecedented time. We implore you not to abandon families in desperate need of our state-funded shelter system, which has provided safety and stability to families and children experiencing homelessness for four decades. We know that together we can move beyond this emergency toward a better tomorrow for children and families in the Commonwealth.

Sincerely,

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Endorsing Organizations (as of November 5th):

Arise For Social Justice

Bedford Public Schools

Berkshire County Regional Housing

Berkshire Housing Development Corp.

Cambridge Economic Opportunity Committee (CEOC)

Casa Myrna Vazquez

Central West Justice Center

Children's HealthWatch

Children's Law Center of Massachusetts

Chinese Progressive Association

Citizens' Housing and Planning Association (CHAPA)

City of Boston Mayor's Office of Housing

City of Somerville Office of Housing Stability

Clarendon Early Education Services, Inc.

Cognitive Holistic Healing

De Novo Center for Justice and Healing

East Boston Social Centers

Emmaus, Inc.

Everett Haitian Community Center

Family and Community Resources, Inc.

Family Promise North Shore Boston

Greater Boston Legal Services

Housing Justice for Survivors, Legal Services Center of Harvard Law School

IFSI-USA

Jane Doe Inc. (JDI) - MA Coalition Against Sexual Assault and Domestic Violence

Jewish Alliance for Law and Social Action

Jewish Family & Children's Service

JFS of Metrowest

JRI Health

Massachusetts Advocates for Children

Massachusetts Coalition for the Homeless

Massachusetts Immigrant and Refugee Advocacy Coalition (MIRA)

Massachusetts Law Reform Institute

Massachusetts Public Health Association

Metropolitan Area Planning Council

Metrowest Legal Services

MLPB

My Life My Choice
Northeast Justice Center
One Family
Pathway for Immigrant Workers, Inc.
Pioneer Valley Habitat for Humanity
Progressive Democrats of Massachusetts (PDM)
REACH Beyond Domestic Violence
Regional Housing Network of Massachusetts
Safe Passage
Salasin Project
Sisters of St. Joseph of Boston
St. Clare of Assisi
St. James's Episcopal Church
True Alliance Center, Inc.
Vasquez Mary Kay
Western Massachusetts Network to End Homelessness
YWCA Central Massachusetts

cc:

Members of the Massachusetts Legislature
Secretary Ed Augustus, Executive Office of Housing and Livable Communities
Secretary Kate Walsh, Executive Office of Health and Human Services
Cristina Aguilera, Executive Director, Office for Refugees and Immigrants
Lieutenant General Scott Rice, Emergency Assistance Director