



**MASSACHUSETTS COALITION FOR THE HOMELESS**

Committed to ensuring that everyone has a place to call home

## **Testimony to the Special Commission on Emergency Housing Assistance Programs from the Massachusetts Coalition for the Homeless**

By Kelly Turley, Associate Director  
November 1, 2024

Thank you to Secretary Walsh for chairing last week's listening session for advocates and community-based organizations and to the Lieutenant Governor and the full membership of the Special Commission on Emergency Housing Assistance Programs for this opportunity to supplement our oral remarks with this written testimony from the Massachusetts Coalition for the Homeless (the Coalition).

As we look ahead to the next chapter in the Commonwealth's response to family homelessness, we affirm and echo the Commission's guiding principles that family homelessness should be rare, brief, and nonrecurring and that the Emergency Assistance (EA) system should be "designed to address the needs of different family populations" and not one-size-fits-all. To operationalize these principles, we offer the following recommendations.

### **Making Family Homelessness Rare**

We encourage the Commission to focus on investing more resources upstream and adjusting existing policies to ensure that more families who have housing can retain that housing to avoid homelessness. Specifically, we ask the Commission to support:

- Shifting eligibility for HomeBASE upstream to allow families to use HomeBASE resources more easily to stay in an existing apartment
  - Current HomeBASE eligibility criteria, which are tied to EA eligibility, make it particularly challenging for families who will be imminently eligible for EA to utilize HomeBASE benefits to remain in place.
- Removing the Notice to Quit requirement in the Residential Assistance for Families in Transition (RAFT) program
  - By waiting until families and individuals already have a notice to quit from their landlords, we are missing opportunities to intervene earlier in housing crises.
- Increasing the standard maximum benefits available under RAFT to at least \$10,000/household/year and introducing additional flexibility to better serve larger families, families with disabilities, and families facing extreme rent burdens.

### **Making Family Homelessness Brief**

We ask the Commission to call for the appropriation of additional resources for robust and meaningful housing search. Such investments would help more families to swiftly exit shelter into safe, affordable, and permanent housing. Housing search assistance from dedicated

rehousing staff is vital to helping families navigate the challenges of the current housing market, including elevated rent levels<sup>1</sup> and extremely low vacancy rates.

To make a family's experience of homelessness brief, families need access to resources, services, and stability. While the state continues to impose a 7,500-family cap on EA shelter access, we encourage the Commission to advocate for the expansion of priorities that allow families to more swiftly access shelter and rehousing supports and to retain shelter via hardship waivers. For example, having one or two chronic health conditions may make unsheltered homelessness particularly dangerous, but the current prioritization criteria require a family member to have three chronic health conditions. Similarly, a 10-month-old baby or pregnant person in their second trimester would be at substantial risk if they were forced to stay in a place not meant for human habitation, but the current criteria do not explicitly cover them.

### **Making Family Homelessness Nonrecurring**

We urge the Commission to recommend that the Commonwealth increase the number and quality of state-funded long-term housing subsidies and subsidized units through the Massachusetts Rental Voucher Program, local housing authorities, and similar programs to meet the needs of families who are not able to get on track to be able to pay market-rate rents in the next few years. We also call on the Commission to focus on making HomeBASE as nimble and effective as possible. In part, this could be done by scaling the HomeBASE awards to match families' needs related to income, family size, accommodations, and regional housing markets.

### **Rejecting One-Size-Fits-All Approaches**

It is critical that the state moves forward in ways that are family-centered, trauma-informed, and culturally responsive. We strongly believe that the current time limits on stays in Emergency Assistance (EA) placements and the Temporary Respite Centers (TRCs) go against the Commission's goal of shift away from one-size-fits-all approaches to addressing family homelessness. Thus, as the Commission crafts its recommendations, we ask the Commission to officially call for an end to arbitrary time limits and punitive policies, including:

- The 9-month cap on Emergency Assistance shelter stays
- The 5-day limit on Temporary Respite Center stays
- The 6-month ban on access to EA shelters for families who have stayed in TRCs

These policies are having unintended (but predictable) consequences of leaving children and parents in transit stations, hospital emergency rooms, and other places not meant for human habitation. We call on state officials to add capacity within the EA program and, if that is not feasible, to ensure that there are at least 7,500 shelter placements available and bring on additional TRC capacity statewide, expanding beyond the current portfolio of Eastern Massachusetts sites.

### **Immediate Next Steps**

We hope that there are additional chances for meaningful dialogue with the Commission as the state navigates the ongoing state of emergency and seeks to better serve children and families experiencing homelessness. We also urge the Commission to schedule additional listening

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<sup>1</sup> Each year, the National Low Income Housing Coalition (NLIHC) releases an updated version of the *Out of Reach: The High Cost of Housing* report, which looks at the cost of housing for renters across the United States. In the most recent report, released in June 2024, Massachusetts was ranked as the second least affordable state in the nation, behind only California. NLIHC has calculated that a Massachusetts worker would need to earn \$44.84/hour, or work 120 hours/week at minimum wage, to afford a modest two-bedroom apartment at fair market rent while also paying for other basic needs. See <https://nlihc.org/oor/state/ma>.

sessions with families participating in the Emergency Assistance (EA) and Temporary Respite Center (TRC) programs and with advocates and community-based organizations. During the previous sessions with families participating in the TRC program and with advocates, multiple parents and advocates who prepared to give oral testimony were unable to do so given the high level of interest in and short duration of the sessions.

### **Additional Recommendations**

As the Commission prepares to draft its report, we would like to share recommendations previously delivered to the Administration last November. The attached recommendations were developed by the Coalition, Massachusetts Law Reform Institute, Citizens' Housing and Planning Association, and the Moving Beyond the Emergency Working Group.<sup>2</sup> The recommendations are centered on:

- “1. Expanding available services for newly-arrived immigrant families and improving 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”

We hope that the Commission's work and report will help the Commonwealth reimagine our response to family homelessness, uphold the right to shelter, rescale and reprioritize our efforts to prevent homelessness, promote housing stability, address historical and ongoing racism and discrimination in our housing and shelter program, provide safe harbors and opportunities for families already experiencing homelessness, and affirm housing as a human right. We stand ready to do our part to bring these goals to fruition.

Thank you for your thoughtful consideration of our recommendations and for your leadership on deepening Massachusetts' commitment to ending housing instability and ensuring that everyone has a safe and permanent place to call home.

If you have any questions or feedback, please reach out to us at the Coalition: [kelly@mahomeless.org](mailto:kelly@mahomeless.org) and 781-595-7570 x17.

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<sup>2</sup> The November 2023 recommendations also are available here: [https://www.mahomeless.org/files/ugd/6c63ec\\_cb6dd3f56d5b4b28a882cf4a1a7e7b7f.pdf](https://www.mahomeless.org/files/ugd/6c63ec_cb6dd3f56d5b4b28a882cf4a1a7e7b7f.pdf)