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TO: Benjamin Bryant, Senior Policy Manager, Executive Office of Housing and Livable Communities
Eric Shupin, Chief of Policy, Executive Office of Housing and Livable Communities

FROM: Steven Farrell, Chief Operating Officer, Metro Housing|Boston

RE: Housing Policy Recommendations for the Executive Office of Housing and Livable Communities

Thank you for inviting Metro Housing|Boston to submit our housing priorities and policy recommendations. As the largest regional provider of rental assistance in Massachusetts and the organization that distributes the most funds for emergency housing payment assistance (RAFT, ERAP, ERMA, etc.) as well as the Metro Boston provider of HomeBASE assistance, we are proud of our role on behalf of the Commonwealth, serving households with extremely low incomes who face housing instability and homelessness. We welcome the opportunity to work with you and other members of the Healey/Driscoll Administration to address these issues, and to streamline and improve services. Two critical ways to achieve this is through the collection and analysis of data, and to continue to engage Metro Housing and our fellow organizations as valued partners.

Before diving into our priorities and policy recommendations, we would like to address a timely housing issue: The administration's goal for families living in emergency shelter. I believe it would be valuable not only for Metro Housing and our partners, but also to the Commonwealth, for EOHLC to clearly state the goal for these families. Is the goal to reduce the number of families entering and staying in shelter? Is it to secure permanent, stable housing for families in shelter? To shorten shelter stays or eliminate the use of motels? Or is there another goal?

We believe that the answer to these questions will clearly inform next steps. Previous administrations have shown that if the goal is to merely reduce the number of families in shelter, that can be accomplished. However, without a permanent housing solution and the resolution of the underlying issues that lead to homelessness, any solution will be short-lived.

At least in the short term, specifically for families entering and remaining in shelter, all the players should be at the table, and housing should be part of the solution. As was shown when we worked with the state after Hurricane Katrina and fully utilized the Housing Consumer Education Centers, organization and centralization of logistics is also important.

Thank you again for this invitation. Please let me know if you have any further questions or need clarification about these themes or categories.

CATEGORIES/THEMES

Vouchers & Public Housing

Federal Housing Choice Voucher Program, Massachusetts Rental Voucher Program, Alternative Housing Voucher Program, and state and federal Public Housing: People are homeless and in emergency shelter because they cannot afford homes. To that end, we recommend that the administration:

- Immediately pledge to spend all the funds allocated by the legislature for MRVP before the end of the fiscal year. At the end of FY 2023 it appears that more than \$20 million of MRVP funds remained unspent. Strategies to spend down funds, in addition to those already being implemented, might include issuing more vouchers, simplifying the voucher issuance process, seeking legislative approval to pay market rents in the current hot and competitive market, and increasing the administrative fee from \$50 to \$60, thereby acknowledging the increased cost for staffing that has occurred since the administrative fee was last increased.
- Target state vouchers for longest stayers in emergency shelter and families for whom there is likely no other exit strategy.
- Call for the MRVP to be codified which would provide dependability and consistency to owners, program participants, and administrators.
- Long term, the administration can support and include in future budgets a steady increase in the number of available MRVP vouchers and, ultimately, support making the program an entitlement.
- Much time is spent sending letters and trying to contact applicants who have been on waitlists for many years. MRVP is moving to an online application system soon; however, EOHLC's federal voucher program is still paper driven without an online option for applicants to maintain and update their information, and administering agency staff must manually input application information into the state's software. This is inefficient and costly and should be addressed promptly.
- Vouchers, however, are only useful if there is a place where they can be used and if they can be leased up quickly. Therefore, we recommend that EOHLC work with the regional administering agencies to identify potential process changes and efficiencies that could be implemented, such as using eligibility for MassHealth or other similar programs as an immediate income eligibility finding for the MRVP.

There are a multitude of ways that the rules can be updated or amended to encourage quicker leasing. EOHLC can work with private owners in addition to the RAAs to determine what might encourage them to lease to voucher holders. One example, for the federal program, would be to lift the requirement that apartments be vacant before an HQS inspection can be performed.

Requiring an apartment to be vacant before it can be inspected delays lease ups and poses an additional challenge to owners who would like to rent to voucher holders but when faced with the opportunity to lease an apartment immediately to a non-voucher holder or to wait 30 – 60 days to lease to someone who has a voucher, they logically choose the former which places voucher holders at a disadvantage.



Meanwhile, the production of state and federal public housing must be incorporated back into the calculation of housing development in Massachusetts. We do not have enough housing that is available and accessible to households that have extremely low incomes. New housing that may be produced under Housing Choice and the MBTA legislation will not prove to be a significant source of housing for those who are in shelter and who have the lowest incomes. Other than vouchers, public housing is the only option available for these households.

Counseling & Guidance

The Housing Consumer Education Centers (HCECs) are a priority for Metro Housing because the HCEC serves as a primary conduit and “front door” for many of the state’s housing services that we provide. Unfortunately, additional funding that would have been useful to the administration of the program was vetoed by the governor. RAFT, in the form of short-term emergency assistance, is a tool used by the HCECs to keep people housed. HomeBASE is a tool used by HCEC and other partners to divert families from needing to enter shelter and to assist families with exiting shelter. Both programs cost less per person than the average length of a shelter stay. During the pandemic, federal resources and state policy changes prevented what could have been significant levels of evictions. Having learned from that experience, we recommend that the administration:

- Ensure adequate investment in the HCEC model which supports households (without eligibility requirements) in navigating housing options so they may remain stably housed or to secure new housing. This is particularly relevant if RAFT and other federal and state COVID funds are exhausted, eliminated, or reduced.
- Rather than contracting with new organizations that do not have experience administering housing support services, work with the HCECs to ramp up the necessary staffing to provide the level of support desired by the state.

As mentioned earlier, the HCECs were a key nexus for one of the nation’s previous significant housing crises (Hurricane Katrina). If resourced appropriately, they can be tapped again to serve a similar role with respect to the current family shelter crisis. Working with shelter providers, the Welcome Centers, and others, preferably with logistics coordinated by MEMA, HCEC’s existing infrastructure can be combined with services from across multiple systems and leveraged with significant efficiencies.

Short-Term Rental Assistance - Residential Assistance for Families in Transition (RAFT)

We recommend that the administration:

- Eliminate the requirement that a family provide a Notice to Quit or otherwise enter the eviction process before obtaining RAFT assistance. This is not required by the line-item and is not consistent with expedient access to services and the goal of preserving tenancies.
- Increase funding for RAFT while efforts to increase vouchers and housing production for households with extremely low incomes advance.



Housing Production to Serve Families at Risk of Homelessness & in Shelters

As stated earlier, housing production for the sake of additional market-rate apartments does not address the housing crisis facing families who have extremely low incomes. Using data that is available, we know that households who enter shelter have an income of less than 115% of the federal poverty level, and we know that each household has at least one child. Using these data, it is clear that we need to produce housing and provide housing options that meet the needs of that population.

The concept that any additional home will help drive down the cost of homes at the lower end of the price range does not have merit in Massachusetts' housing market. Economically speaking, the law of supply and demand does not apply; these homes are completely different products. There is nothing transitory between a market-rate, high-rise condo in a downtown Boston neighborhood, a four bedroom/five bath single family on half an acre in a suburb, or a two bed/two bath apartment in an inner suburb of Boston or Gateway city. This is not just the opinion of Metro Housing. Economists also suggest that trickle down housing policy does not work. ([WGBH](#), July 2023 and [Housing is a humanright.org](#), May 2021)

Right to Counsel

Various states and municipalities have implemented "Right to Counsel" legislation to help level the playing field between landlords (the vast majority of whom have legal representation) and tenants (the vast majority of whom do not usually have legal representation). We recommend that the administration:

- Support current legislation to implement a right to counsel in Massachusetts and provide the funding necessary to implement it.

Asset Building: Family Self-Sufficiency Program/Mass LEAP/SNO Mass, Financial Education, & Homeownership

Asset building is a way for households to increase their housing stability and their economic well-being. Asset building programs have an outsized impact on BIPOC families, who are disproportionately locked out of homeownership in comparison to White families. Increasing assets for BIPOC families results in generational wealth and is an upstream approach to equity. We recommend that the administration:

- SNO Mass – The critical work SNO Mass is doing in communities of opportunity has been building steadily in the regions it is currently being implemented. However, there are several challenges to the program being more successful, such as recruiting and retaining property owners. Achieving geographic diversity of property owners is a priority for Metro Housing; brainstorming ways for EOHLC to help achieve that would be significant.
- FSS & FES – Take steps to replicate and strengthen asset development programs that support voucher holders and other families and individuals in Massachusetts.

Housing Navigator and Housing Applications

The Housing Navigator website features a comprehensive online database of income-restricted housing. Although in most cases our region's developments are oversubscribed and applicants are added to waitlists rather than able to immediately access housing, the Navigator plays an important role in access, equity, and reducing barriers to housing search. We recommend that the administration:

- Support the visibility of the housing navigator system.
- Build on the existing foundation by supporting and actively encouraging owners and funders to create a single application that can be used by prospective tenants for all housing listed on the site.

Fiscal Health of and Support for Nonprofit Organizations

It is extremely challenging to recruit and retain staff members and to pay competitive wages to administer programs for the Commonwealth. This is exacerbated when the organizations do not receive fees or payments that reflect the true cost of this work. Having cost-reimbursable contracts and no ability to retain revenue or keeping voucher administrative fees at artificially low levels are examples of this situation. We recommend that the administration:

- Phase out the cost reimbursement approach.
- Increase allowable administration fees ceiling, and restore the HCEC inflation adjustment provision in the FY24 budget that Governor Healey recently vetoed.
- Solicit input from providers through Request for Information processes and listening sessions and actively engage providers when designing new programs or changes to existing programs.

For example, the MRVP bonus that is going to be implemented for new leases will be helpful and is appreciated. Currently, unlike the federal voucher program, the state voucher program only pays administrators once a voucher is leased. However, a great deal of work goes into pulling names from the waitlist, sending letters, performing briefings, meeting with applicants and gathering their information, and issuing the voucher. MRVP does not compensate the administering agencies for any of that work. The bonus, although appreciated, will not benefit the administering agency if the household fails to lease up, and the payment after lease-up also ignores that the work and staff costs are accrued at the beginning of the process. Therefore, Metro Housing encourages the administration to pay administering agencies based on the number of vouchers they are allocated rather than waiting until they are leased.

HomeBASE and Shelter Access

- Continue to fund HomeBASE as an alternative to entering the emergency shelter system, and fund and support upstream prevention efforts prior to the need for emergency shelter.
- Considering the dire situation of homeless families presenting themselves to alternatives to the DTA office at all hours of the day, including hospitals, airports, police and fire stations, the state should fund and staff 24-hour options for families to be assisted seven days a week.



Equity and Fair Housing

There are many different ways for the Commonwealth to help ensure equity when it comes to housing. One way is to make sure that federal and state fair housing laws are followed. A recommendation is that state funding be increased for fair housing enforcement so providers can protect households against source of income discrimination in addition to the other federal and state-protected classes such as race and familial status.

EOHLC could also translate vital leased housing voucher documents into the preferred languages of Massachusetts' residents. Now, in most cases, this is done on a case-by-case basis by every individual administering agency. It is inefficient, costly, and can be confusing for administrators, program participants, and owners. This type of statewide approach proved effective for RAFT and the Emergency Rental Assistance Program (ERAP). We should apply what was learned from those programs to other EOHLC programs.

Additionally, from our own experience and published research (such as Suffolk University's [Qualified Renters Need Not Apply](#), July 2020), we know that discrimination against voucher holders is rampant. Families with very low and extremely low incomes face many barriers in an obscenely tight regional rental market. Metro Housing would support EOHLC increasing the availability of funding to educate voucher participants about their rights and owners and realtors about their responsibilities in this area. We also support and encourage greater accountability across the board.

Technology/Voucher Applications

Although mentioned briefly above, Metro Housing would like to clearly state that it is well past time for the Commonwealth to implement not just a single application for state-funded, privately owned housing but also an online federal voucher application system, an idea that was recently the subject of a [Boston Globe editorial](#). Although applicants in Metro Housing's region can complete the Section 8 application in an online form we created (which has doubled the number of applications we receive monthly), our staff must manually copy and paste the details into another system for the state-sanctioned waitlist. Unbelievably, the most efficient way to update address changes is for the applicant to contact us via the USPS. An online federal voucher application system would allow applicants to update and manage their information as they would for many other services such as Amazon, Best Buy, or Stop & Shop. As highlighted in another [recent article](#) in The Boston Globe, given Metro Housing's 14-year wait list with thousands and thousands of families, that is a lot of Forever stamps.

As you can see, there is no shortage of ideas, and what Metro Housing has provided in this memo is not exhaustive. We want to work with the administration to fashion and implement policies that can make a difference now as we also plan and strategize for the longer term.

Please do not hesitate to contact me if you have any questions or require additional information. Thank you again for this opportunity.