



September 20, 2024

Lieutenant Governor Kim Driscoll  
Chair, Special Commission on Emergency Housing Assistance Programs

Secretary Kate Walsh  
Executive Office of Health and Human Services

Secretary Edward Augustus  
Executive Office of Housing and Livable Communities

Dear Lt. Governor Driscoll, Secretary Walsh, and Secretary Augustus:

The Children's League of Massachusetts is a statewide non-profit association of organizations that collectively serve children and that advocate for public policies and quality services that are in the best interest of the Commonwealth's children, youth, and families. Representing community-based providers of a myriad of child and family services across the Commonwealth, we write today as a voice for children.

We appreciate that the Administration shares our desire for every family in the Commonwealth to have long-term success and independence. But changing Massachusetts' current Emergency Assistance (EA) Family Shelter policies can have the unintended consequence of driving families with children into the streets. We recognize the difficult position the Commonwealth is in due to the rapid growth in the number of families needing help from the EA system. There has been an influx of immigrants with high needs, our federal government has failed to provide sufficient financial investments, and there is an ongoing statewide affordable housing crisis. But we can never lose sight of our humanitarian responsibility to keep children safe and able to thrive.

### **Children Suffer Without a Right to Shelter**

The right-to-shelter law in Massachusetts was established in 1983 specifically to prevent children from experiencing homelessness and we cannot abandon that fundamental principle.

Physiological foundational needs include breathing, water, food, sleep, and shelter, and the United Nations Universal Declaration of Human Rights states that "*Motherhood and childhood are entitled to special care and assistance.*"<sup>1</sup> We are equally concerned for our Massachusetts residents who

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<sup>1</sup> UN Universal Declaration of Human Rights, Article 25. <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

struggle to achieve stability and our newly arrived immigrant community members, many of whom have fled dire conditions in their countries of origin. Limiting access to the EA shelter system and its linked network of services—regardless of resident status—has numerous repercussions and increases social, economic, and racial disparities in our communities; and ultimately puts more children in danger.

- Increases the likelihood that more children and families will suffer adverse physical, emotional, developmental, educational, and employment outcomes.
- Destabilizes families and increases their needs for more concrete supports like food, toiletries, and other economic help.
- Exacerbates trauma and contributes to chronic, acute stress for parents or caregivers that also trickles down to kids, leading to dysregulation negatively impacting their development and mental health for years, if not a lifetime.<sup>2</sup>
- Jeopardizes education stability, as students experiencing homelessness ultimately graduate at significantly lower rates than students from families with low incomes who are stably housed.
- And perhaps most alarming is that limiting access to the EA shelter system puts more families in the same (or worse) conditions that lead the Massachusetts' Department of Children and Families to traumatically remove children from their parents, undermining our efforts to reduce involvement of the child welfare system for conditions other than abuse or neglect.

### **Sustainable Solutions**

We acknowledge the challenges of the Administration in aligning families' real and complex needs with a sustainable shelter system. We hope that continued inclusive, transparent conversations with service providers, affected families, and cities and towns will help the Commonwealth meet this challenge. Our shared goal is long-term sustainable solutions that offer efficient but robust supports for families to move out of homelessness and create more space for the next families in need. These solutions include:

- Creation of more affordable and supportive housing, including workforce housing.
- Maintaining efficient and sustained flow of subsidies to families, without stoppages that disrupt families preparing to exit shelter.

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<sup>2</sup> The Future of Families and Child Wellbeing Study shows even low levels of housing insecurity leads to worse health and mental health experiences. <https://ffcws.princeton.edu/>



- Maintaining flexible timelines and extensions, coupled with accountability to ensure families are meeting their treatment goals, obtaining workforce authorizations, and achieving other stability milestones that keep them on a forward path to exiting shelter in a timely fashion.
- Flexibility to leverage the various state and federal funding streams that can be braided to meet the specific intensive case management needs of each family.
- Re-establishing the maximum benefit of Rental Assistance for Families in Transition (RAFT) to \$10,000 – a level where it had been previously before July 1, 2023 to better support family housing stability.
- Reducing reliance on hotels.

We appreciate the Administration's difficult position and efforts to maximize support to families and ensure our service landscape, inclusive of both state agencies and community-based service providers, are able to best serve all the vulnerable populations in need of housing in the Commonwealth. Our goal is the same – to prevent any child from spending a night on our streets and to provide families with not just shelter, but compassionate support and effective pathways to stable, permanent housing and well-being.

Sincerely,

Rachel Gwaltney  
Executive Director  
Children's League of Massachusetts