Building a Better RAFT

Improving Access to Emergency Rental Assistance in Massachusetts











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Contents

EXECUTIV	E SUMMARY	3
	CTION rch Overview	
CHALLENG	GES IDENTIFIED	7
CRITERIA	FOR EVALUATING RECOMMENDATIONS	8
POLICY R	ECOMMENDATIONS	9
Remove excessive barriers to access		9
1.	Invest in a robust communications and outreach strategy	9
2.	End the requirement to submit a Notice to Quit (NTQ) with the RAFT application	9
3.	Address logistical barriers within the application process	10
Increa	se capacity of the program and its partners	15
4.	Increase RAFT rental assistance budget and extend assistance to cover future rent in addition to rental arrears	15
5.	Formalize CBOs into RAFT programming and fund them at the level needed to maintain RAFT support staff	16
6.	Allocate funding to increase capacity and efficiency of RAAs	19
Build a	and support relationships within the rental assistance ecosystem	19
7.	Bring CBOs and RAAs into policy and program design and formalize a feedback and iteration process	19
8.	Clarify and document roles, relationships, and best practices	
Impro	ve transparency of program operations and outcomes	20
9.	Clearly define program goals and collect and report data on program and household outcomes	20
10.	Seamlessly connect RAFT programming and applicants to additional housing support programs	21
Addre	ss housing instability, barriers, and conditions more broadly	22
•	Make upstream investments to reduce the rate of eviction	22
•	Convene stakeholders to identify the right policy for eviction record protection	
•	Collect data on living conditions	
•	Low barrier cash assistance	
CONCLUS	ON	24

Executive Summary

The 2020 COVID-19 pandemic shutdown and ensuing job losses threatened to unleash a wave of evictions when laid-off renters could no longer cover rent payments. Fortunately, Massachusetts' multi-pronged eviction diversion initiative helped to avert a catastrophe. Alongside an eviction moratorium, new emergency rental assistance programs with expanded eligibility and larger benefits meant that more people could use these programs to stay in their homes—if they were successful in accessing support.

While the COVID public health emergency has expired, the need for emergency rental assistance continues. Due to a combination of housing cost burden, low savings rates, and employment instability, many renters are still at high risk of falling behind on their rent. There is interest among state leadership to continue funding programs such as Rental Assistance for Families in Transition (RAFT.) However, the success of emergency rental assistance programs depends not only on adequate funding, but also on implementation practices that ensure eligible households are aware of the available support and have pathways to access it.

Experience with COVID-era emergency rental assistance programs can point the way to more successful programs in the future. In 2022, Citizens Housing and Planning Association (CHAPA), the Boston Foundation, and the United Way of Massachusetts Bay established the Neighborhood Emergency Housing Support (NEHS) Program. This one-time grant program funded community-based organizations (CBOs) to conduct proactive outreach to residents and support them in accessing emergency rental assistance and other housing stability resources. Over the last 10 months, the Metropolitan Area Planning Council (MAPC) studied the experiences of service providers and community residents who participated in the NEHS program. MAPC reviewed administrative data; met

with stakeholders; and organized focus groups with program administrators, CBOs, tenants, and landlords.

Through this research, it became clear that many at-risk households did not know about available housing stability resources, and many who did apply had a hard time successfully receiving assistance. This was particularly true for applicants of color, immigrant renters, and those for whom English is a second language. Program administrators and CBOs had limited resources to support applicants, and a fragmented provider network made it hard to coordinate efforts. Applicants and their advocates had no transparency into the process, and to many it felt like the program failed to address—and in some ways exacerbated—the systemic factors that contribute to housing instability.

The need for emergency rental assistance remains strong, and the fundamental challenge to implementation is that the funding is insufficient to meet the scale of need. The project partners involved in this research recommend that RAFT be funded at \$250 million with a \$10,000 cap per applicant in fiscal year 2024. Whatever the budget amount, our recommendations suggest ways to improve the equity, efficiency, and effectiveness of emergency rental assistance programs in Massachusetts.

End the requirement to submit a Notice to Quit with the RAFT application. In 2022, the state established a new requirement that tenants demonstrate the urgency of their application by providing a "Notice to Quit," the first step in an eviction process. The intent was to limit the number of applications and focus funding on those renters whose situation is most dire. However, this policy discourages at-risk tenants from applying, makes an eviction more likely if assistance is not received,

and undermines long-term housing stability outcomes. Other, less problematic approaches can help screen and prioritize applicants, such as using administrative data to identify households with the greatest need. But such screening and filtering wouldn't be necessary if RAFT had sufficient funding to help all those who are in need.

"The eviction letter is something very difficult.

I think that many people do not access this aid because they do not want to have an eviction letter that means you are going to the street and that is something very difficult for anyone."

—Tenant focus group participant

Explore a direct-to-tenant payment model to alleviate documentation barriers. The application process requires extensive—and to some, invasive—documentation from landlords. Getting this documentation was a major barrier for some RAFT applicants. Those with month-to-month leases (or no lease at all), out-of-state landlords, or landlords who didn't want to share tax information couldn't access rental assistance. The program should explore pathways for applicants who can't access or provide the necessary documentation, including payments directly to tenants.

"I have not been successful [in applying for RAFT] because one of the documents they needed was my landlord's W-9 form. My landlord's family is very much against submitting the W-9 form. They didn't want to provide their Social Security number either. Because of this, my case can't proceed.... I still can't get the relief."

—Tenant focus group participant

Formalize CBOs into RAFT programming and fund them at the level needed to maintain RAFT support staff. For many tenants, direct assistance from a local CBO was essential to a successful application for rental assistance. These organizations, working in flexible and individualized ways, helped tenants learn about their eligibility, compile documentation, navigate the process, and advocate for themselves.

This assistance was especially important to those most vulnerable: undocumented tenants, those not fluent in English, and those without access to technology. This crucially important role for CBOs should be formalized and adequately compensated through program funding.

"[A CBO we work with] is now approaching us with new ideas, such as, if you can share with us all of the [municipal] applicants whose applications are about to be closed due to non-response, we will personally contact every one of them and work with them to get the materials. That's huge. And it's something our staff have no time to do at that level."

-RAA focus group participant

Bring CBOs and administering agencies into policy and program design and formalize a feedback and iteration process, informed by program and household outcomes. The state should take advantage of the expertise of CBOs and RAAs by bringing them into policy and program design conversations from the start. These organizations work directly with tenants and landlords on RAFT applications and know what's working and what's not. Their input can increase the equity and responsiveness of RAFT and can lead to more efficient operation and more effective use of RAFT dollars.

"In the future [we hope that] the legislators who write these policies, and the company that they contract with to design those systems, and the evaluation criteria questions, whatever, actually sit with people who are doing this research, who are gathering this information. That they sit down with CBOs and advocates. Really to be with them as they design this, so that it really makes sense."

—CBO focus group participant

These recommendations and others are explored in depth in the full report.

Introduction

The COVID-19 pandemic brought economic and housing instability to households across the country. Federal and state eviction moratoriums were enacted for a period of time early in the pandemic to prevent a wave of evictions as millions lost jobs and income. Alongside these eviction moratoria, states and localities across the country expanded or started new eviction diversion and emergency housing payment assistance programs in order to help keep people who were still struggling from being evicted. In Massachusetts, this included expanding eligibility and funding for Residential Assistance for Families in Transition (RAFT), and starting multiple new programs, such as the federally funded Emergency Rental Assistance Program (ERAP), the Subsidized Housing Emergency Rental Assistance (SHERA) program, and the Emergency Rental and Mortgage Assistance (ERMA) program.

This policy brief presents key recommendations from a research project conducted by the Metropolitan Area Planning Council (MAPC) with funding and guidance from three organizations: Citizens' Housing and Planning Association (CHAPA), the Boston Foundation (TBF), and the United Way of Massachusetts Bay. The goal of this research is to better understand and highlight the role of community-based organizations (CBOs) in facilitating access to emergency housing payment assistance in Massachusetts. For the purposes of this research, we consider CBOs to be nonprofit organizations that provide broad service support and education to certain populations, whether defined by geographic location, language group, ethnicity, circumstances such as homelessness, or other characteristics.

The research builds on CHAPA's Neighborhood Emergency Housing Support (NEHS) grant program which operated from December 2021 through May 2022. The NEHS program provided funding to 22 participating CBOs across Massachusetts to support efforts to get the word out about state and federal emergency housing payment assistance opportunities and to help community members apply to these programs. Housing sector leaders, including CHAPA, TBF, and United Way, observed how much effort CBOs were putting into publicizing these programs and helping their clients apply during the height of the COVID-19 pandemic, and at the same time heard from these organizations that they did not have the internal resources to bring these support efforts to the scale needed in their communities. The NEHS program was a direct response to the need for dedicated funding for CBOs to support their communities during the unprecedented housing and economic instability brought on by the pandemic.

For simplicity, and because it is the only remaining program in operation, the remainder of this brief refers to the RAFT program when discussing emergency housing payment assistance in Massachusetts, unless specifically mentioning another program. This brief explains the primary criteria used to evaluate potential administrative, policy, and budget interventions and offers a set of recommendations for the RAFT program. Recommendations are organized by priority within each of four main topics. The recommendations presented here are the result of listening to the experiences and ideas of CBOs and other stakeholders and shaping them into recommendations that can improve program delivery and outcomes.

Research Overview

This research consisted of a literature review; evaluation of program and survey data; conversations with an advisory group of CBOs, Regional Administering Agencies (RAAs), and landlords (referenced throughout this brief as "stakeholders"); and focus groups with CBOs, RAAs, landlords, and tenants.

The literature review and data analysis served as an important baseline for the rest of the research by placing emergency rental assistance within the larger context of housing stability, identifying statewide housing instability and emergency assistance application trends as well as trends specific to the work of CBO partners, and establishing the benefits of rental assistance nationally and in Massachusetts.

Conversations with stakeholders provided space to vet the literature review and data findings through the experiences of those working on the front lines of emergency rental assistance. Focus groups with CBOs, RAAs, landlords, and tenants who have worked with a CBO to apply for emergency rental assistance provided further exploration of the specific experiences of tenants through this application process, to build out and provide context for the challenges and opportunities identified in the literature, data, and by stakeholders. Quotes throughout this brief come from conversations with stakeholders and focus group participants.

The literature review, quantitative data analysis findings, and qualitative research methods can be found in the appendix of this brief.

REGIONAL ADMINISTERING AGENCIES

RAAs are nonprofit organizations that administer RAFT and other state and federal housing subsidy programs. There are nine RAAs across Massachusetts, each serving a different area. RAAs accept, review, and approve RAFT applications. They also provide direct support to RAFT applicants as needed, in addition to other services.

COMMUNITY-BASED ORGANIZATIONS

CBOs are nonprofit organizations that provide broad service support and education to certain populations, whether defined by geographic location, language group, ethnicity, circumstances such as homelessness, or other characteristics. CBOs have helped clients learn about and apply to the RAFT program since before the COVID-19 pandemic.

Challenges Identified

Discussions with stakeholders, the literature, and quantitative and qualitative findings uncovered numerous barriers to accessing emergency rental assistance and ways that the effectiveness of RAFT could be enhanced through policy, program, and budget reform. Five major policy challenges emerged:

EXCESSIVE BARRIERS TO ACCESSING AND COMPLETING THE APPLICATION.

Residents confront numerous barriers when trying to apply for RAFT, such as trouble accessing and navigating the online application portal, acquiring the numerous required documents for the application—especially those needed from their landlords—and language barriers for applicants who are not strong English speakers. In turn, CBO and RAA staff are burdened by the individualized and iterative work required to help applicants overcome these and other challenges.

LIMITED FINANCIAL CAPACITY OF THE PROGRAM, CBOS, AND RAAS.

Stakeholders agree there are simply not enough RAFT subsidies to meet demand; and RAAs and CBOs don't have enough funding or staff to assist all residents in need. CBO and RAA stakeholders expressed a need for more financial support, including up-front and flexible funding, to continue, expand, and improve their work with households in need of RAFT assistance.

FRAGMENTED PROVIDER NETWORK AND SYSTEM.

Distrust and its repercussions permeate the RAFT process. Some residents and landlords lack trust in government while CBOs perceive that state actions do not demonstrate trust in CBO judgment and operations. Relationship-building across agencies

at all levels of housing service—from the state to CBOs—is needed to improve communication flow and enable effective collaboration.

LACK OF TRANSPARENCY AND DATA.

A deficit of data about program operations and outcomes leaves administrators unable to answer questions about how equitably, efficiently, and effectively the program is operating and whether the funding has led to stable housing for recipients.

SYSTEMIC HOUSING UNAFFORDABILITY AND INSTABILITY.

RAFT is only one piece of the puzzle when it comes to housing stability in Massachusetts. Increased funding won't fundamentally alter the larger systems that create unstable and unaffordable housing in the first place. All parties involved in this research recognize the emergency nature of RAFT as a housing stability intervention and advocate in tandem for changes to improve its success alongside other housing policy interventions.

The recommendations below present a set of solutions to each of these challenges. The literature review and conversations with stakeholders underscored the interconnectivity of all aspects of housing stability. Improving households' overall housing stability facilitates a more efficient use of RAFT funds, because if fewer households face instability in the first place, fewer demands will be placed on the RAFT system. All the recommendations included here will be even more successful if implemented in the context of other wraparound efforts to improve housing stability across the state.

Criteria for Evaluating Recommendations

Three criteria
were used to
evaluate the many
ideas and generate
a concise list
of policy
recommendations.



MAPC identified more than 90 potential policy actions to address barriers and opportunities that emerged through the research. Recommendations ranged from highly specific and short term to broad and interconnected. Three criteria were used to evaluate the many ideas and generate a concise list of policy recommendations.

FOCUS: The extent to which each idea focuses on emergency rental assistance. This criterion is necessary for aligning recommendations with the scope of research and making actionable recommendations for parties with the authority to make program, policy, and budget changes.

EQUITY: The extent to which each idea addresses disparities within RAFT operations or outcomes. This criterion reflects an overarching goal of the project partners and stakeholders to respond to inequities experienced by RAFT applicants. We favored policy actions that expressly and intentionally prioritize the needs of residents who have been marginalized by past or present policies.

IMPACT: The extent to which a recommendation could benefit large numbers of households and the organizations that serve them. We chose to highlight those with impact across the Commonwealth, while recognizing there are important policy needs specific to certain communities or organizations that we were unable to include here.

Policy Recommendations

In consultation with the research partners and stakeholders, MAPC filtered and consolidated potential policy ideas into 10 key recommendations. They are organized into groups based on the five overarching challenges described earlier in this report. Generally, stakeholders agreed about which recommendations to include; however, we have included counterpoints to some of the recommendations where there was not clear consensus.

REMOVE EXCESSIVE BARRIERS TO ACCESS.

1 Invest in a robust communications and outreach strategy.

Among stakeholders there was general consensus that applying for emergency rental assistance programs in Massachusetts can be opaque and confusing for tenants and the CBOs supporting them. The process has been made somewhat more manageable through the Department of Housing and Community Development (DHCD) updated user portal, launched in early 2023, which has made the application process easier and more transparent for users. However, many residents are simply unaware that they are eligible for emergency rental assistance and don't know how to go about accessing that help.

It is critically important that DHCD advertise the program widely and accessibly so that people know this resource is available to them and how to access it. Communication materials should include very simple information and instructions, written in plain language, 1 as a first entry into the RAFT process. Materials should be supplemented with diagrams, infographics, and other communication tools to help applicants and advocates follow the application process with ease.

Resources should include contact information for the appropriate RAA; basic information about RAFT eligibility, documentation requirements,

and how to access the application portal; and information about CBOs serving specific geographies, languages, or communities (such as those who are homeless or do not have access to technology). These materials should be translated (see recommendation 3b) and made available digitally on the RAFT portal and in paper form distributed widely to CBOs, housing support programs, and state and municipal service offices.

Communications and marketing materials should be designed with RAA and CBO input to ensure the language and design is broadly accessible to their client bases.

2 End the requirement to submit a Notice to Quit (NTQ) with the RAFT application.

In June 2022, DHCD enacted a policy to require tenants to submit documentation of a Notice to Quit in order to be eligible to apply for RAFT. Many stakeholders felt that this policy undermines the RAFT program's long-term housing stability outcomes.

A Notice to Quit (NTQ) is the first official step in an eviction process, in which the landlord notifies the tenant of a potential eviction due to nonpayment. After a specified notice period (two weeks, in the case of eviction for nonpayment of rent), the landlord can then start an eviction case by completing a summons and complaint, serving it to the tenant, and filing it with the court.

Plain language is a concept of writing in a straightforward and concise style to make government communications accessible and understandable to a broad audience. From plainlanguage.org: "Plain language makes it easier for the public to read, understand, and use government communications." Guidelines, examples, and training are available via plainlanguage.gov.

Focus group participants and stakeholders believe this requirement may discourage tenants in need of rental assistance from applying, for fear of having an eviction record, and potentially being evicted from their homes.

"The eviction letter is something very difficult.

I think that many people do not access this aid because they do not want to have an eviction letter that means you are going to the street and that is something very difficult for anyone."

—Tenant focus group participant

Eviction filings for non-payment of rent in Massachusetts are up 68 percent year-over-year for quarter 1 in 2023, according to the Massachusetts Trial Court Summary Process dashboard. Eviction filings started to increase in the second half of 2022, after the Notice to Quit policy was enacted in June, showing a 53 percent increase in filings in the second six months of the year compared to the first six months. While we can't say for certain that the Notice to Quit policy created this increase on its own, evidence from the experiences of our research participants and stakeholders suggests that it likely has played a role.

Despite a consensus that ending the RAFT NTQ requirement is a critical need, a stakeholder explained that one of the reasons DHCD enacted this requirement was to serve as a filtering mechanism so that the system would not be overwhelmed by applications, and so that applications would come only from tenants facing the most urgent housing situations. In reality, however, many tenants in great need of rental assistance who may not yet face eviction are forced to ask their landlords to serve them a NTQ so that they can apply for RAFT.

While acknowledging a practical need for some sort of application filtering mechanism, stakeholders agreed that NTQ is not an appropriate one.

"We need to find a way to demonstrate that [rental assistance without NTQ] can be done without breaking the system."

—Stakeholder

Further, stakeholders emphasized that, rather than identifying a method for filtering to a narrower pool of applicants, what is really required is more RAFT funding to accommodate the tremendous need for rental assistance across the state (see recommendation 4), and more funding for CBOs and RAAs to support the application and approval process at a larger scale (see recommendations 5 and 6). This includes more resources for RAAs to identify fraudulent applications.

One tool used in homelessness prevention to identify and provide proactive support for households at high risk for homelessness is the use of data-driven predictive modeling or targeting. This method analyzes household-specific administrative data across factors known to indicate risk for homelessness to identify individual households that may be at risk. This is an emerging practice in homelessness prevention programs that has been identified for potential use in emergency rental assistance programs in the U.S. (see <u>literature review</u> for relevant sources). One critical limitation of this approach is that it will miss people who do not have a data footprint, including undocumented tenants who may be especially vulnerable to eviction and are an important population to reach for emergency rental assistance in Massachusetts.

DHCD should convene a working group composed of DHCD staff, CBOs, RAAs, advocates and tenants to come together to develop alternative approaches to identify applicants with the most critical need for emergency assistance.

- **3** Address logistical barriers within the application process.
 - a. Add needed features to the online application portal for ease of use.

Technology challenges were identified as a major barrier facing tenants applying for RAFT on their own, as well as CBOs attempting to assist them. DHCD has made attempts to address this challenge by creating various iterations of an online portal for applications—

an improvement over the pre-COVID paper application process. The updated application portal that DHCD rolled out in early 2023 has addressed several of the challenges and concerns raised by stakeholders and focus group participants, including stability of the platform and transparency of application status. The new portal's transparency has allowed RAAs and CBOs to focus on the more complex individual cases that arise and how to resolve any of their application or documentation gaps.

Despite these important modifications, the new portal is still problematic and there are some specific ways it should be improved:

- CBOs typically have multiple staff and volunteers helping tenants with RAFT applications, yet there is only one log-in for each CBO. This makes it very difficult for CBOs to monitor the individual work of each staff or volunteer and keep track of who is helping which clients. DHCD should update the platform to allow each CBO to have individualized accounts within their organization with administrator privileges for one or more main program staff. The administrator should be able to view and access all of the organization's accounts for tracking and quality control, but the work of each user should be clearly differentiated and identifiable.
- Similarly, many landlords and management companies own or manage multiple properties. With the current portal set-up, landlords can only have one property address connected to their log-in. This is forcing landlords to create fake email accounts so that they can set up accounts for additional properties. Not only is this bad practice, it

adds time and headache to landlords' required contribution to a tenant's application. Many landlords are not willing to provide this extra support (or do not know they can), which has meant that many tenants in need of assistance simply cannot apply.

These are two high-priority features that should be addressed, but for the long-term success of the RAFT portal and program, DHCD should improve usability by a wide range of users. The process should employ user-centered design² principles to ensure that the new portal is legible and easily navigable. The design process should include input from RAAs, CBOs, and landlords, and user testing with RAAs, CBOs, applicants, and landlords (*related to recommendation* 7).

These users can provide critical feedback about the functionality and ease of use of the system, and can bring new ideas to the table about feature design. For example, during a tenant focus group, when discussing the need for transparency in the application process (prior to the roll-out of the new system), one tenant suggested that the RAFT application portal should be modeled after college application portals, which provide efficient and effective automated status updates.

"If I could change the way it's done?
Simple: I would put a system like the ones
colleges and private systems have, in which the
applicant himself could upload the documents and
there's a record; you see what the administrators
are seeing; and there are communication systems
that when the person answers the email you see
if it has been read, has been answered...
And the checklist should be there, saying this
or that was sent, you need to have this, etc.

² User-Centered Design (UCD), as defined by the <u>Interaction Design Foundation</u>, is: "an iterative design process in which designers focus on the users and their needs in each phase of the design process. In UCD, design teams involve users throughout the design process via a variety of research and design techniques, to create highly usable and accessible products for them."

You fill in the criteria and it appears automatically, without anyone needing to say if they received it or not and without having to send it to anyone's personal email."

—Tenant focus group participant

This kind of creative thinking from an outside perspective can help DHCD streamline and improve the application experience for tenants, landlords, and CBOs so that RAAs can focus on more complex issues like fraud detection or tricky application cases.

b. Translate application and reference materials into all high-demand languages.

Currently, the RAFT application and supplementary materials are available in English only, unless translated by a CBO as part of its work to support applicants. This creates significant barriers for some non-English speakers and makes them dependent on support from CBOs or others for a successful application. It also places an additional burden on CBOs serving diverse communities with multiple languages. DHCD should translate all RAFT application and supplementary materials into a set of languages in high demand in Massachusetts, with a simple and expedient path for translating into additional languages as needed. DHCD should consult with a language access expert to determine which standard languages to translate materials into.

Translations should be done through a professional translation service, and not using Google Translate. While Google Translate is a simple and free tool, it typically produces a literal translation, rather than a translation that accounts for cultural and linguistic context and housing sector jargon; this results in confusing, and in some cases nonsensical, application and reference materials.

"All the applications should be language accessible and not just plugged in on Google Translate, where they don't make sense. We had to let them know, hey, this application, the way that it's translated it doesn't even make sense."

One commonly experienced language challenge is that professional translation services often use an overly formal style of translation that may not resonate with or be readily understood by immigrant communities. CBO partners who are fluent in each language and serve each language group community should be in communication with the hired translation service to answer terminology questions and review final translations.

c. Explore a direct-to-tenant payment model to alleviate documentation barriers.

Stakeholders appreciate the clear checklist of application requirements on the RAFT website. Despite this clear list of requirements, confusion and challenges remain when applicants are gathering the required documents. The documentation requirements that have caused the most challenges for applicants are those that depend on the cooperation and support of their landlord:

PROOF OF CURRENT HOUSING (such as a lease, tenancy agreement, or tenancy at will agreement) Many residents in great need of rental assistance do not have a formal lease agreement with their landlords. In some cases, they may be subleasing from the person who is formally named on the lease; in some, they may have an undocumented status, in which case they may not want their living situation to be documented; in others, the landlord may choose not to have a formal lease with the tenant for various reasons.³ This makes it more

³ In more than one case, we heard from stakeholders that landlords choose not to have a lease so they could more easily evict or convince tenants to move out without a formal process. Determining the reasons landlords may not execute formal agreements is worth further investigation.

difficult and time consuming for tenants to apply and for CBOs to assist them. Without the support of a CBO that has assisted individuals in similar situations, some tenants are likely to assume they are not eligible for assistance and simply not apply. Even among those who do have a CBO supporting them with landlord communication and/or mediation, some are unable to get landlord support and therefore are unable to submit an application.

"I, as a former advocate, [have noticed that] people rent places and they don't have rental agreements. They don't because the landlords don't want to declare that extra income.

They refuse to cooperate on the proof of hardship. The landlord was the hardest part."

—Tenant focus group participant

VERIFICATION OF HOUSING CRISIS (such

as a Notice to Quit, an eviction notice, a utility shutoff notice, or documentation showing an inability to stay in your current home due to health, safety, or other reasons) Unless a tenant has already been served with a Notice to Quit or other such documentation, requiring this can be a deterrent to applying for RAFT if it requires seeking one from the landlord, as described in recommendations 2 and 3c.

LANDLORD'S W-9 AND PROOF OF

OWNERSHIP There are two separate issues that applicants and landlords run into with the requirement for a landlord W-9 and proof of ownership. First, as described in 3a, it is a cumbersome process for landlords with multiple properties to verify ownership and tax identification number through the online portal. This can be remedied with the application portal feature development from recommendation 3a. The second issue that tenants and CBOs have experienced is that some smaller landlords are wary of or opposed to sharing their tax identification numbers or Social Security numbers due to a fear that their information will be stolen or misused.

"One thing that we're still seeing as a difficult challenge is the homeowner packet.

Very difficult for us to build trust with a low-income landlord. It could be a small landlord. Maybe he owns a two-family, three-family home. Maybe he or she doesn't speak English. And we're all of a sudden asking for tax information so that we can order a blank check. So that we can help their tenant pay the rent."

—CBO focus group participant

"I have not been successful [in applying for RAFT] because one of the documents they needed was my landlord's W-9 form.

My landlord's family is very much against submitting the W-9 form. They didn't want to provide their Social Security number either.

Because of this, my case can't proceed. It is stuck here, can't move on. I've submitted all the personal information I can provide.

But my landlord just would not provide his personal information. As such, it's been stuck here—I still can't get the relief."

—Tenant focus group participant

To alleviate the burden of getting landlord support, we recommend that DHCD explore a direct-to-tenant payment model. There are some concerns that need to be addressed with this approach, such as the impact on a tenant's own income for tax purposes, and on their ability to receive other aid due to income level, but it is worth investigating pathways for addressing those concerns so that tenants with especially uncooperative landlords can still apply for this life-saving program.

d. Explore impact on path to U.S. citizenship.

Massachusetts' RAFT program is available to all families regardless of U.S. citizenship or immigration status. No immigration documentation is required for the application. Nevertheless, unless a form of identification is available, many undocumented tenants choose not to apply for RAFT out of uncertainty regarding

the impact that receiving rental assistance may have on their path to U.S. citizenship. Some immigration lawyers advise their clients against applying for RAFT because of the **Public** Charge Ground of Inadmissibility rule, which states: "Under this rule, DHS would determine that a noncitizen is likely at any time to become a public charge if the noncitizen is likely at any time to become primarily dependent on the government for subsistence, as demonstrated by either the receipt of public cash assistance for income maintenance or long-term institutionalization at government expense." DHS has indicated that the Public Charge rule does not apply to any individual who "receives benefits from the government to help to meet some needs but is not primarily dependent on the government and instead has one or more sources of independent income or resources upon which the individual primarily relies." Such individuals are not considered to be "primarily dependent" on government support, and there seems to be room for interpretation of the rule. However, in the experience of research stakeholders and participants, many immigration attorneys provide a conservative interpretation in order to protect their clients. Unfortunately, the resulting aversion to seeking emergency rental assistance can lead to eviction and housing instability for undocumented tenants.

On December 23, 2022, the Department of Homeland Security, U.S. Citizenship and Immigration Services issued a new Public Charge Ground of Inadmissibility final rule which addresses the use of public benefits related to the COVID-19 pandemic, and explicitly states that these benefits, or any benefits paid for using American Rescue Plan Act (ARPA) dollars, are not considered when making public charge inadmissibility determinations: "You may seek pandemic-related benefits and services (including food assistance, housing programs, and others) for which you are eligible—without fear of negative consequences to your immigration status."

This new rule should ease the concerns of undocumented residents seeking RAFT assistance as long as the program is considered a COVID relief program or is paid for with ARPA dollars. With the expiration of the federal COVID Public Health Emergency and the use of other funds for rental assistance, immigration attorneys and advocates may justifiably be concerned the RAFT assistance poses a risk for triggering the Public Charge Ground of Inadmissibility rule.

The state should convene a group of housing and immigration attorneys and policy experts to explore the legal repercussions of current and future RAFT assistance on undocumented tenants' path to citizenship. This group should provide recommendations for more protection for undocumented RAFT applicants and, as appropriate, pursue further policy change to remove any potential threat to applicants' attainment of U.S. citizenship.

e. Develop a clear and intentional customer service and support structure.

Stakeholders and focus group participants lamented the inadequate customer support and communication options available to them while trying to apply for RAFT, including the inability to identify the right person to talk to for help, and lack of support structures.

"There was just nobody you could talk to.
There's nobody to talk to, like, anywhere.
You call, like, housing places and ask the people
who work there for help, and they basically tell
you just no. Everything is by mail, they say.
Check your mail."

-Tenant focus group participant

"Getting in touch with them was a tedious process, because you were on hold.
You were number 59 for four hours, trying to get some feedback."

-Landlord focus group participant

Focus group participants did not indicate whether their frustrations were with DHCD staff, RAA staff, or others. However, they do highlight the need for all organizations engaged in the RAFT process to invest in cultural competency and customer service training. It's important that people seeking to apply for RAFT, who are already experiencing challenging and emotionally charged circumstances, be treated with empathy and respect.

"One of the RAFT workers began to treat me badly and I did file a complaint. One is already in a bad place, like overwhelmed, you know, from the situation one is going through, and even more if they keep pushing and pushing you.... I think [they should] change the RAFT personnel because they are very mean, aggressive, as if they have no heart, you know?"

—Tenant focus group participant

"You call them with a question, and they avoid your calls, or they call you days or weeks later, or they talk to you extremely arrogantly. So then, the training for these people must be stricter; just as they are strict when requesting documents from us, their training should be. Number one, they need to have compassion for the families they are working with. Because the compassion that they do not have is what burns out the flame of [our] community."

—Tenant focus group participant

With financial and human resources stretched so thin, it may not be surprising that some staff are not meeting tenant expectations and needs for customer service. Additional investment in staff, training, and customer service protocols for both DHCD and RAAs will enable staff to have a more deliberate, helpful, and personal connection with applicants (see recommendation

6). This could contribute to more completed RAFT applications, and additional positive outcomes for applicants, alongside the actual rental assistance.

INCREASE CAPACITY OF THE PROGRAM AND ITS PARTNERS.

Increase RAFT rental assistance budget and extend assistance to cover future rent in addition to rental arrears.

RAFT is a lifeline for tenants struggling with financial insecurity. During the COVID-19 pandemic, emergency rental assistance was a matter of life and death for many. While the public health emergency of the pandemic has subsided to a large degree, the financial outlook of many tenants in the state of Massachusetts remains uncertain. Housing prices in the state continue to rise, wages for many service and low-skill workers remain low, and the unemployment rate is still higher than it was prior to the pandemic.⁴ We heard from stakeholders and focus group participants that the demand for RAFT remains great, and that many tenants in serious need of support have been unable to apply, have been denied support, or have not received enough to cover their arrears.

Based on the demonstrated need for emergency rental support, we recommend that the state's FY24 budget include at least \$250 million for RAFT and the state should permit tenants to access up to \$10,000 per applicant per year. The state should also look to increase funding and annual caps in future years. It is quite clear that the \$162 million for RAFT in Governor Healey's FY24 budget is insufficient to meet current demand, and it caps support at \$7,000 per household over two years (below the \$4,000 per year cap that existed in 2019.) While this may enable the program to serve more tenants, it also means that some with the greatest need won't get the full resources to remain in their current housing.

Source: Bureau of Labor Statistics Local Area Unemployment Statistics, Massachusetts seasonally adjusted unemployment rates in March 2020 and March 2023 of 2.8% and 3.5%, respectively.

Several stakeholders noted that while RAFT and other programs reduced the immediate risk of eviction for applicants who did receive funding, there is real need for longer-term rent support. While RAFT currently allows for one future month's rent in some cases, many tenants don't know that it's an option and that they must check a box on their application to request it.

"Somebody who is renting a room [may] not owe the past rent because they're doing everything that they can finding it to pay.

So what they need a lot of time is the current rent right now and next month, and moving into the future. Because last month they had to miss food, clothing, or sell their bodies somewhere to find that money.

So yes, when you say [that an applicant already has to be] three months behind, and they need to have an eviction, it's not that they're not already in a state of [housing crisis].

It's not that they have the money to pay the past rent. It's just that they had to do whatever that they could to stay afloat."

—CBO focus group participant

Stakeholders agree that DHCD should better advertise the availability of resources to cover the one month of future rent, or make it a default benefit for all families that apply. DHCD should also consider expanding this benefit for two or three months' future rent. This benefit will allow households with the most housing instability to maintain their housing longer, giving them more time to save up and find steady sources of income or less expensive housing.⁵

5 Formalize CBOs into RAFT programming and fund them at the level needed to maintain RAFT support staff.

Many of the recommendations in this brief aim to make the RAFT application process more streamlined and accessible so that more people can apply more quickly and on their own, without necessarily needing the support of a CBO or RAA. Nevertheless, CBOs have played a critical role in helping tenants apply throughout the COVID pandemic and prior to it. We can confidently say that there will be a continuing need for CBO support in a variety of areas: getting the word out to their clients about the program; helping tenants who can't access or don't know how to use the internet; serving as a mediator with uncooperative landlords; and connecting tenants to resources that can help them with other complicating factors such as domestic violence, immigration challenges, or health problems, among others. Evidence from the literature confirms that engagement with CBOs in rental assistance programs improves the efficiency and effectiveness of these programs.

CBO staff work in flexible and individualized ways to meet each client's unique needs; they meet individuals where they are and spend time getting to know their holistic needs and building trusting relationships. Stakeholders and focus group participants highlighted several ways that CBOs played a critical role in the RAFT process.

Many applicants learn about the availability of resources such as RAFT through their local CBO.

"Sometimes we don't find out about the aid that exists out there. I worked for a while in City Hall and a few hours in [my local CBO] when I heard those talks and asked if I qualified. They told me yes; they shared with me the information and they took my personal information, then on behalf of the [CBO], [CBO staff] helped me to gain stability."

—Tenant focus group participant

⁵ Data on long-term housing stability outcomes are needed to evaluate the effectiveness of such an intervention (see recommendation 5).

RAAs expressed that partnering with CBOs ensures a greater reach to households in need, and better relationships and communication with applicants throughout the process, as well as more thoroughly complete applications.

"[A CBO we work with] is now approaching us with new ideas, such as, if you can share with us all of the [municipal] applicants whose applications are about to be closed due to non-response, we will personally contact every one of them and work with them to get the materials. That's huge. And it's something our staff have no time to do at that level."

-RAA focus group participant

"I think it's always good to have partnerships.... When you have connection and relationship with community-based organizations in other areas, they may have an understanding of what's happening in that area that you may not be aware of and be able to give some content and context to what is happening, and why specific resources or specific assistance [are needed in their community]."

—RAA focus group participant

As noted, tenants often rely on CBOs to help them apply for RAFT. CBOs help applicants navigate the application process, help them with technology when they are not able to access technology on their own, or when they do not have the capacity or tech literacy to apply on their own. They directly translate application materials into non-English languages, and they help translate the application into plain language, even for English-speaking applicants.

"We actually had to not only translate the application [into a non-English language].

We had to explain it....

They couldn't understand it."

—CBO focus group participant

"First, my English is not good enough to [apply on my own]. Second, I really don't know which agency I should apply to. [My local CBO] is the only one I know. . . . There are many, but without really understanding the application channel, it's better to rely on the staff at [my local CBO] to help me with the application."

—Tenant focus group participant

DHCD should have a list of CBOs on hand (and included in the materials mentioned in recommendation 3a) with fluency in different languages to share with applicants who need additional application support in a language other than English.

CBOs also often act as mediators between tenants and their landlords.

"I have staff who are working Saturdays and Sundays because that's when landlords and tenants are available. And we don't want to disrupt their financial stability. So it's weekend hours. It's time that [CBO staff] should—would have normally been with their families. It's gas money, because they're taking a drive to [another municipality] to make sure they can meet the landlord and build that trust with that landlord from [the other municipality] so that they can actually get the landlord portion of the packet."

—CBO focus group participant

"The trust that homeowners have in the [local CBO is key] because many homeowners don't like to share their information but when we say it is on behalf of the [CBO], they have great confidence when sharing their personal data."

—Tenant focus group participant

CBOs also simply make themselves available to their clients, and build long-term relationships with them. They earn the trust of their clients by treating them as whole humans, by showing up when their clients need them, and by sticking with them:

"[My recommendation would be to have] more places like [the CBO I worked with]—people, like, just in place to help. Because at least I thought, you know, even though it took like four months with them when they started helping me, I knew that they were going to help me just because I could tell by the way they were operating and following up and that... if I didn't get help from them, yeah, I definitely would still be 100 percent homeless and not really knowing what's going on."

—Tenant focus group participant

CBO focus group participants estimate that it can take an hour of staff time, in a straightforward case, to help an individual process an application, and as many as 10 hours when a client needs more help gathering documentation and communicating with their landlord. Funding should reflect the demands on CBO staff time working with individual clients. This includes accounting for the extra work that some CBOs take on, for example, those who provide additional translation and interpretation support for applicants who do not speak English.

Further, it is challenging for CBOs, especially smaller ones, to hire and maintain staff when they don't have funds up-front to do so. These organizations often operate on very small budgets and have little breathing room for the overhead required to hire, train, and retain employees. The turnover CBOs have experienced with staff who support RAFT has made it hard to provide continuous support to their clients, and because these staff frequently serve multiple other roles on top of RAFT support, they are often spread so thin that they can't commit to or be consistently available for regularly scheduled meetings and trainings with their partner RAA. This has led to

inconsistencies in approach to application standards. It has also meant that not all CBOs are able to provide support to all who need it.

"By and large, it's worked well. It really depends on the organization. We have some that dedicated a significant number of people, albeit not full-time employees, but a significant number of people. They had them trained. We trained them, we worked with them, they maintained contact. There were regular meetings. And then there were others, I would say, at the opposite extreme, which said they were going to do it, wanted to do it, would submit applications from time to time. But then you had trouble getting them on the phone or following up or getting the applications to even be completed accurately, with most of them somewhere in between. Again, I think not for lack of wanting to do it, but because, like everyone, the lack of resources to do it."

—RAA focus group participant

Because CBOs have proven so critical to the success of RAFT, we recommend that the CBOs partnering with RAAs on RAFT support are funded up-front and annually at a level adequate to fund at least one full-time employee, with additional funding as needed to reimburse other staff time spent on individual applications. These funds should flow to CBOs via their regional RAA, in order to solidify, formalize, and strengthen the relationship between the two organizations and foster more established two-way communication.

Of course, if the recommendations presented in this brief are fully implemented, the application burden should be much lower. As more tenants are able to apply on their own, CBOs may need to help fewer clients, and the process will take less time with those they do help. The staff commitment and financial costs of this relationship should be reevaluated at the start of each fiscal cycle in order to align financial support with actual level of effort.

6 Allocate funding to increase capacity and efficiency of RAAs.

A common theme among all stakeholders—
especially CBOs and RAAs—was that the need for
emergency rental assistance and help with
application far outstripped the capacity of these
organizations to provide support. Organizations
working to help with applications for and approve
RAFT funding need additional and dedicated
resources to support existing staff while expanding
their capacity to serve more households in need.

RAA staff are tasked with reviewing all applications, regardless of whether a household worked with a CBO or not. Given expanded eligibility for RAFT during the COVID-19 pandemic and the shift to an online application, RAAs receive more applications than ever before, and still follow up with all applicants to confirm documentation. For example, Metro Housing Boston went from processing 1,700 RAFT applications in 2019 prior to the pandemic to nearly 9,000 applications⁶ in 2021—a fivefold increase.⁷ One RAA's staffing grew sevenfold.

"We had such a high volume that was coming through. And just to give some context to what staff and what the organization were dealing with... we went from five staff to like 35 staff. We went from a \$3 million program to a \$3 million a week check run."

—RAA focus group participant

We recommend that RAAs be better resourced in order to manage their required work more effectively, and so that they can spend time on innovation and staff training to improve their workflows, their communication and customer support methods, and their fraud detection efforts.

BUILD AND SUPPORT RELATIONSHIPS WITHIN THE RENTAL ASSISTANCE ECOSYSTEM.

7 Bring CBOs and RAAs into policy and program design and formalize a feedback and iteration process.

One of the strengths of community-based organizations is their ability to communicate and translate between program administrators and residents, thereby making the RAFT program more accessible. As administering agencies, RAAs see the approval process first-hand and know the common challenges and pain points of the process. The state should take advantage of the expertise of CBOs and RAAs by bringing them into policy and program design conversations from the start, including technology design, as noted in recommendation 3a.

"In the future [we hope that] the legislators who write these policies, and the company that they contract with to design those systems, and the evaluation criteria questions, whatever, actually sit with people who are doing this research, who are gathering this information. That they sit down with CBOs and advocates. Really to be with them as they design this, so that it really makes sense."

—CBO focus group participant

DHCD did bring a small set of RAAs into the design process for the 2023 portal update, which highlighted the value this type of collaboration can bring to the final product. DHCD should expand on this successful collaboration by bringing CBOs and potentially more RAAs into decision-making processes.

The state should also have an easy-to-access and ongoing mechanism for receiving feedback on program operation from users, including RAAs,

⁶ Applications in 2021 included multiple different emergency rental assistance programs that were initiated in response to the COVID-19 pandemic, in addition to a larger RAFT program.

⁷ See quantitative findings memo.

CBOs, tenants, and landlords. They should build flexibility into the design of the program to iterate based on the experience of users. The feedback process should be designed with input from users to maximize ease of use.

8 Clarify and document roles, relationships, and best practices.

Stakeholders and focus group participants expressed a need for greater clarity on the division of roles and coordination of work among service provider networks. One approach to clarifying networks is to assign a designated RAA contact in each geographic area, where not already in place. This provides a strong line of communication from clients up to administering agencies.

"We work directly with [our region's RAA] and we kind of serve as a first glance of proofread. And then [the RAA] submits. And our likelihood of getting these applications approved is like close to 100. We have a pretty good system. And we have reached thousands and thousands of families in the city, neighboring communities. And it has just been really good."

—CBO focus group participant

We heard from stakeholders that a best practice has been to set weekly meetings with the RAA and the CBOs so they can dive more deeply into individual cases.

"We had weekly scheduled meetings.
We also had dedicated staff.... The CBO
apps only went to these specific staff people.
And that was extremely helpful. Having
consistency, having them be able to build that
relationship so that we could have some
uncomfortable conversations at times
was really key in helping to iron out some
stuff as we went forward."

—RAA focus group participant

Likewise, RAAs identified that it was very productive to have dedicated staff at DHCD to communicate with and meet with regularly to discuss application review and approval standards, discrepancies, and gaps in the program or application process.

"What worked for us on a personal level is DHCD giving us a person to have that conversation with once a week. And then they would be like the mediators with DHCD on our end to bring up our concerns."

-RAA focus group participant

We recommend that DHCD document and compile a set of best practices, such as these regular RAA and CBO, and RAA and DHCD meetings, to be shared with all RAAs that are working with CBOs. We also suggest adding a meeting for CBOs to interface with DHCD, perhaps with their RAA partners in the room as well.

IMPROVE TRANSPARENCY OF PROGRAM OPERATIONS AND OUTCOMES.

Clearly define program goals and collect and report data on program and household outcomes.

RAFT and the numerous other emergency rental assistance programs in place during the COVID-19 emergency were necessarily expanded or initiated rapidly. They accomplished the critical task of getting massive amounts of funding out to households in need of financial support to stay in their homes. However, few program objectives and performance metrics were explicitly defined, and DHCD has published scant information about the operations and eviction diversion outcomes of the program.

For ongoing and future programs such as RAFT, DHCD should clearly define program goals that can be measured over time, so that program success can be evaluated and refined. In order to evaluate emergency rental assistance programs against stated goals, DHCD must collect data appropriate to the immediate and longer-term housing outcomes of applicants. They should make these

data available to service providers, researchers, and public agencies who can help evaluate the effectiveness of the program.

Metro Housing Boston, the RAA for Metro Boston, has compiled annual RAFT reports since FY2014.⁸ These reports provide an example of what can readily be analyzed and published by the state.

Our recommendation is that DHCD develop, monitor, and publish comprehensive measures of program process and outcomes, including the following metrics, cross-tabulated by demographic and household characteristics:

- Processing time
- Approval rate
- Reason(s) for denial
- Rental assistance dollars requested, approved, and allocated per applicant
- Total rental assistance dollars requested, approved, and allocated statewide and per RAA, per year
- Applicant satisfaction with the process, collected through an applicant survey

We also recommend that DHCD follow the housing outcome of each RAFT applicant in the near term after approval or denial:

- Was the tenant evicted within 3, 6, or 12 months of approval or denial?
- Did the tenant apply for additional RAFT funding within the same year or in the following year?

These metrics can help DHCD and its partners monitor the performance of the RAFT program, iterate on program and application design for maximum housing stability benefit, and identify and address any disparities by language, race and ethnicity, and other characteristics.

Seamlessly connect RAFT programming and applicants to additional housing support programs.

RAFT is, by definition, an emergency support to households facing the immediate risk of eviction. However, it is evident from this research that to achieve housing stability many households in Massachusetts need more than the short-term Band-Aid that RAFT can provide.

"We need to decide if we're advocating for another stop-gap focused on preventing immediate eviction, or deeper restructuring; more long-term, sustained, holistic support."

-Stakeholder advisory group participant

DHCD should work across its programs to create a more seamless process to connect emergency and long-term housing strategies. For example, the Massachusetts Rental Voucher Program can provide households with long-term housing cost relief, yet DHCD does not connect RAFT participants directly to this kind of programming. Often, CBOs work with clients to make these connections.

"We [CBOs] treat these cases as long-term success cases. It's not a Band-Aid that we're putting on a body that needs surgery. We treat it as if we need to do surgery. That means we need to work on their jobs and income. We need to work on their mental health. We need to work on all these little pieces that eventually will affect this RAFT application that's going to help them. But the state needs to see it that way. And they need to understand that it has to go combined with wraparound services in order for them to save money. The state will save money if we treat it as wraparound services because the families won't need to come back for money. They'll be able to complete their sustainability or success plan that they create with [our] organization."

—CBO focus group participant

⁸ Metro Housing Boston's annual RAFT and Emergency Housing Payment Assistance reports can be found on the Publications page of their website: https://www.metrohousingboston.org/news-events/publications/.

Whether working with CBOs to expand wraparound assistance, taking on some of the work internally, or both, DHCD should explore with internal and external stakeholders how to make readily accessible all the different available housing and economic support services that can help households on a path to stability. These interconnections should be made seamlessly, automatically, and equitably.

ADDRESS HOUSING INSTABILITY, BARRIERS, AND CONDITIONS MORE BROADLY.

Emergency rental assistance can be a lifeline for tenants facing an eviction crisis, but it would be even better if tenants found themselves in emergency situations less often. With access to more affordable housing, rental assistance vouchers, cash assistance, social supports, and economic opportunities, tenants will have more housing stability and will be less likely to find themselves falling behind on rent. While policies related to housing stability more generally are outside the scope of this research, we feel it is important to include some of the key ideas raised by stakeholders and focus group participants for future consideration:

 Make upstream investments to reduce the rate of eviction.

Implement universal access to the Massachusetts Rental Voucher Program, as outlined in <u>A Right to Rental Assistance in Massachusetts: How Policy</u>

<u>Change Can Advance Equitable Housing</u>, authored and published in December 2022 by Metro Housing Boston, the Boston Foundation, CHAPA, and other housing and policy organizations.

Invest in legal counsel to avoid eviction filings. (i.e., mediation services).

Require eviction prevention plans for large landlords.

This could also serve as a form of accountability

for landlords who receive RAFT payments.

 Convene stakeholders to identify the right policy for eviction record protection.

Tenants with an eviction record often face challenges finding new homes to rent because some landlords can be reluctant to rent to someone with an eviction history. Stakeholders were in agreement on the need for tenants to be protected from long-term housing instability due to a previous eviction filing. Stakeholders did not agree, however, on the appropriate pathway for creating eviction record protection.

Some stakeholders referenced existing eviction sealing legislation as an important path to ensuring that no-fault evictions would not damage future housing prospects. Eviction sealing is a process by which evicted tenants can petition the court to seal their eviction record from public view. Under current legislation filed by Senator Edwards (S. 956) and Representative Moran (H. 1690), tenants would have an opportunity to seal their eviction records following conclusion of the legal process and appeals. Evictions for nonpayment of rent could be sealed no sooner than four years following the action and all appeals.⁹

However, other stakeholders raised concerns about eviction sealing, including its impact on data availability and unintended consequences that increase housing barriers with tenant screening methods that account for credit and income. An alternative solution offered by these stakeholders would make eviction history a protected class, thus making discrimination based on this history illegal.

The organizations participating in this study, as well as many of the stakeholders, already have formal positions on current eviction sealing legislation. However, because we were not able to reach consensus within this process, our recommendation is that further dialogue

⁹ An Act Promoting Housing Opportunity and Mobility through Eviction Sealing (HOMES) https://malegislature.gov/Bills/193/SD1592

should be pursued on the solution for this important topic.

Collect data on living conditions.

CBO stakeholders raised that even as tenants were applying and getting approved for RAFT funds to pay arrearages, some of their housing units were in serious states of disrepair. Unit inspections paused in most municipalities early on in the COVID pandemic and have been slow to pick up back to pre-pandemic levels. It is important that municipalities and the state address this issue so that RAFT does not simply subsidize landlords who are ignoring hazardous and unsafe unit conditions. We recommend that the state develop a way to collect, track, and publish data on housing unit conditions from inspections.

• Low barrier cash assistance.

Unrestricted access to cash assistance can make a great difference in the lives of people and families struggling with financial and housing instability. There are many municipal-scale direct cash assistance pilots and programs in Massachusetts and around the country. Policy makers should engage with leaders in this space and stakeholders and recipients of these programs to identify opportunities for scaling.

Conclusion

With these recommendations, we aim to capture a vision of what rental housing support could look like and offer action steps to get there. Competing forces and piecemeal approaches have left us with an imperfect system. The pandemic showed us how dire need could be but also how an influx of resources can make an enormous and life-saving difference. It showed us, too, how communities with strong support networks, such as those created by local CBOs, can be resilient to major shocks like the pandemic. The experiences of the stakeholders and focus group participants of this research provide invaluable insight into ways that RAFT can be improved for the people who need it most. If we can turn these lessons into action, we can make the Commonwealth a more hospitable and prosperous place for everyone.