

The Massachusetts Alternative Housing Voucher Program (AHVP): A Case Study



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Introduction

Historically, accessible and affordable housing in Massachusetts has been limited. In 1995, at the urging of disability advocates, the Massachusetts legislature established the Alternative Housing Voucher Program (AHVP), which offered tenant-based rental vouchers exclusively to disabled individuals under age 60 with a maximum income of 80 percent of Area Median Income (AMI).¹ Regional non-profit housing agencies or local housing authorities (LHAs) administered AHVP or acted as voucher-issuing agencies. As of February 2023, approximately 725 households had leased their homes using the AHVP.

AHVP pays the first and last month's rent along with the security deposit when an eligible person has moved to the top of the waiting list for a voucher, has provided the required documentation, and has found a suitable unit to rent. AHVP vouchers provide permanent rental subsidies, and voucher holders are not required to apply for federal rental subsidies or move to state-funded public housing when they reach age 60. The state legislation establishing the program exemplifies a promising practice for increasing access to housing for low-income disabled individuals. Moreover, this Massachusetts voucher program appears to be unique among state-funded rental voucher programs because it targets people with disabilities under age 60, pays certain rental expenses, has a higher threshold for median income eligibility, and does not require that a voucher holder move out of their unit when they reach age 60.

This case study introduces AHVP and examines its origins and state funding over time. We describe AHVP program eligibility, application processes, and funding, as well as the AHVP's strengths and challenges in the context of regional affordable housing shortages and escalating rental costs. We explore AHVP's impact on reducing housing insecurity and institutionalization for eligible disabled individuals and discuss implementation strengths and challenges from the perspectives of state and local housing officials and disability and housing advocates. We also introduce other Massachusetts policies that reduce housing access barriers and augment AHVP, for instance, a fund that can be used to remove accessibility barriers. Finally, we explore how the program differs from related initiatives in some other states.

Background

AHVP, created by the Massachusetts legislature in 1995, responded to concerns of the disability community about new limitations in the percentage of dwelling units disabled people would be allowed to rent in state-funded public housing, the most prevalent state-subsidized housing at the time.² In 1995, about two-thirds of such public housing was earmarked for older individuals and disabled people under age 60. However, lifestyle differences sometimes made it difficult for older adults and younger disabled people to live together harmoniously. To mitigate these compatibility conflicts, officials decided to limit access for non-elderly disabled renters to 13.5 percent of public housing.

Advocates at that time effectively opposed an initial proposal for a ten percent limit on public housing for disabled people, securing an agreement for a higher percentage even though they thought this latter allocation was still far too low, according to advocates we interviewed. Unsurprisingly, that policy unleashed substantial demand for rental assistance for younger disabled individuals. To fill the gap in part, advocates worked with the state legislature to create an alternative rental-subsidy program for disabled individuals under age 60, which became AHVP. Disabled people over age 60 would also still qualify for public housing designated for older people. One housing advocate remarked,

I think one thing that's a little unique about AHVP for any state who's considering it...is that having advocates be really on top of a program, I think, makes a huge difference. And so, a lot of the things that are interesting or helpful are from advocacy. I think you can't have a program like this and expect innovation if you don't have advocates regularly meeting with the state.

Methods

The Massachusetts Alternative Housing Voucher Program appeared to be a unique state rental subsidy program focused on helping younger disabled people acquire affordable housing. We wanted to learn how the program came about, its strengths

and challenges, and the extent to which it met the needs of its intended beneficiaries. Initially, we reviewed state programs to determine if any other state or states offered a similar rental voucher program.

We interviewed Massachusetts state government officials from several departments charged with implementing housing policy and who were familiar with the AHVP program. We also interviewed LHA directors from several jurisdictions that participated in the program to understand how they perceived AHVP's role in the constellation of housing programs they managed and administered.



Our goal was to learn about the program's history, views about its effectiveness, and characteristics that set it apart from other state rental-subsidy initiatives aimed at or including low-income disabled people. These stakeholders spoke with us about barriers and facilitators to securing housing for low-income disabled people and the extent to which the AHVP met their need for rental subsidies and helped ward off housing insecurity, homelessness, and institutionalization. They also offered their views about additional supports needed to ensure disabled people can use the AHVP vouchers within the timeframe for locating and renting a housing unit.

We also interviewed disability housing advocates familiar with AHVP who discussed the breadth of the housing crisis in Massachusetts for low-income disabled people and the impact that AHVP has had in helping to counter escalating rents and affordable housing shortages in the commercial housing market.

The Brandeis University Institutional Review Board approved the project.³

Program Description

Massachusetts legislators initially conceived of AHVP as a temporary program to assist disabled people under age 60 to secure rent-subsidized commercial housing

until units allocated for disabled renters in state-funded public housing became available. Even though the program remained tied legislatively to state-supported housing, growing affordable housing shortages spurred policymakers to convert the program to permanent status. The funding allocation also grew annually, especially after 2014, when disability advocates increased pressure on the legislature.

The advocates came in and they just went gangbusters on this and got us money and attention. That's when we really started pushing more vouchers, pushing more agencies to issue vouchers.

— *State housing official*

In 1995, when the AHVP began, the Massachusetts legislature allocated \$1.5 million for its operation. For 2024, the governor's approved AHVP budget, including carryover funds from the previous year, was approximately \$26,000,000.⁴ For the past several years, funds left over from the previous year have been allowed to roll over to the current year's budget in recognition of the length of time it takes for a prospective voucher holder to establish eligibility and find housing. The program operates statewide, and the AHVP vouchers are portable, making it theoretically possible for an eligible voucher holder to live anywhere in the state where they meet rental eligibility requirements and can find a rental unit that is priced within the range covered by the subsidy. The rental unit might also need to be accessible.⁵

Eight regional non-profit housing agencies serve as administering agencies that accept applications and coordinate with local housing authorities (LHAs). Fifty-four LHAs can act as issuing agencies for the AHVP, although many choose not to participate. Presently, 25 LHAs are actively screening disabled people for potential eligibility and issuing AHVP vouchers. However, other LHAs still have a role in AHVP administration.⁶ In some cases, the non-participating LHAs accept a voucher holder who is transferring from another location even if that LHA does not actively participate in the program. In other situations, the LHA located where the voucher originates can retain the administration of the voucher when a person moves to a different district that does not participate in the program. The division of rental assistance within the Massachusetts Executive Office of Housing and Livable Communities (EOHLC) administers the AHVP and is responsible for oversight.⁷

In addition, in 2019, the legislature created the Affordable, Accessible Housing Grants program, funded at \$2.5 million in 2023. The program will pay up to \$100,000 per project to create accessible housing or to rehabilitate housing to achieve accessibility. Participating developers and landlords must agree to rent to an AHVP voucher holder when the accessible unit becomes available.⁸

Eligibility

Disabled individuals under the age of 60 with a maximum income of 80 percent of the Area Median Income (AMI) can apply for the AHVP. (AHVP income limits are generally higher than the federal Housing Choice Voucher program, which calls for income of 50 percent of AMI.⁹) Applicants must also be eligible and qualify for state-supported public housing that serves low-income seniors, families, and disabled individuals. Eligibility includes being disabled “with one or more physical or



mental impairment[s]...[of] a long and continued duration, [at least six months,]” and “unable to locate appropriate suitable housing on the private market.”¹⁰

Typically, anyone receiving Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) payments will automatically be deemed disabled.

Others must submit a doctor’s verification.¹¹ Voucher holders are expected to pay 25 percent of their monthly income towards rent or 30 percent if utilities are included in the rent calculation. An LHA will pay the balance.¹²

Application process

Individuals can complete an AHVP application online through the Centralized Housing Application for Massachusetts Programs (CHAMP) or complete a paper CHAMP application. The application is available in seven languages. People using CHAMP can select one or multiple locales where they want to live. Most people

check every locale in the hope of improving their odds of moving up on waiting lists. CHAMP is the simplest and fastest way to apply for AHVP and state-funded public housing and to make address and other changes to the application. LHAs place applicants on the waiting lists for the locales they choose, although it can take months or years to move up on the lists. When an applicant nears the top of an LHA's waiting list, the LHA will contact them to determine eligibility.

Impact of COVID-19 on the AVHP

Several housing officials mentioned how difficult it was for disabled people residing in nursing facilities to carry out the tasks required to move into the community, even when they had a housing voucher. The impacts of COVID-19 brought many of these barriers to light and spurred changes that have lasted after the pandemic. For instance, LHAs now accept electronic signatures on housing forms, whereas they previously required a “wet” signature. The simple matter of transferring documents to a nursing facility, obtaining a signature, and returning the signed forms presented challenges because each of these steps required human assistance that was often not available. A state housing official remarked:

Now [post-COVID-19] we have the ability to do electronic signatures if we need to. If [prospective AHVP recipients are]...in a care center, call them at the care center, confirm their identity, and you sign for them, you record it. You say, 'I have your permission...' and you sign for them. But that was not the norm. So having the ability to normalize a lot of these things that we always encouraged, was helpful. [COVID-19] really sped things up because suddenly, how do I say this? The rest of the world suddenly realized how difficult it was for a person with a disability to get stuff done. And now everyone understood.

Strengths

I really honestly believe that it's been going so well, that we're going to get more and more people on board, both participants but also agencies to run it [the AHVP].

— LHA official

Housing stability

Perhaps most importantly, the voucher stabilizes housing for beneficiaries who sometimes have been waiting years for a rental subsidy and a home of their own. It wards off unnecessary institutionalization and housing insecurity, making it possible for recipients to participate in their communities and look to the future. According to several LHA officials, once housing is secure, some voucher holders report returning to work or school and participating in community activities.

Stable, safe, and accessible housing fosters better health and creates a sense of safety and wellbeing. One LHA official said:



I think that the benefits for the residents to be able to find permanent secure housing where they're not having to move again, I think is huge. I think that a lot of these voucher holders have been waiting a really long time or they're in a very dire emergency situation.

Reduction in competition for scarce rental vouchers and demonstration of need for rental assistance

Advocates and housing officials alike described the program as “vital” because eligible disabled individuals are not competing with other low-income groups, including families, for scarce housing subsidies. Higher income eligibility requirements also set AHVP apart from other federal housing-voucher programs, thereby increasing the number of eligible disabled individuals. In practice, this feature of the program partially offsets the more complex and systemic housing barriers that many disabled people encounter, including those with higher incomes.

Even accounting for these advantages, over 2,100 older and disabled renters were on affordable housing waiting lists in one small locale in Massachusetts, according to

that locale's LHA official. This figure starkly illustrates that the number of people who needed affordable housing far outstripped availability. The locale also reported that only 66 public housing units were designated for people over age 60 or who were disabled. Among these, only eight were set aside for disabled individuals under the age of 60. However, since it began participating in AHVP in 2021, this LHA reported housing over 30 disabled individuals, illustrating that the program provided desperately needed rental subsidies that disabled people could use in the private rental market.

This data also showed the critical need for more affordable housing and rental vouchers under AHVP, specifically for younger disabled individuals. A state housing official said:

In Massachusetts, there's a lot of housing support aimed at families and a decent amount of housing support aimed at elders. But if you're a non-elderly person with disabilities who doesn't have a family...you're just in the general population with everyone else. And [AHVP] creates a program that is focused specifically on disabled people who experience unequal rates of housing insecurity.... It creates basically a priority wait-list of its own for non-elderly, low-income, disabled people.... And it's been used to help fund the creation of more affordable, accessible housing by demonstrating the need, which is huge in Massachusetts.

Portability

Advocates and housing officials alike said that AHVP portability, like the portability features of the federal Housing Choice Program, is a key characteristic of the state program. People with AVHP vouchers can use them in any Massachusetts jurisdiction. This flexibility increases the chances that a voucher holder will find housing within the 120-day time limit for using the voucher. Once a recipient is settled in stable housing, even if it isn't in their preferred area, they can look for a rental where they prefer to live and transfer the voucher to that area if they find a suitable unit.

Permanency and rental financial support

Although the program was created for disabled people under the age of 60, once someone obtains a voucher, they can keep it after they reach 60 and remain in their rental unit for as long as they want. This policy eliminated the earlier requirement that a renter who reached age 60 must face the prospect of moving out and looking for a new place to live when affordable and accessible commercial housing was scarce.

The voucher also pays for the first and last month's rent and security deposit, making it possible for many low-income individuals who might not otherwise have been able to do so to complete the leasing process without such additional financial assistance. AHVP also refunds a security deposit if the voucher holder moves out, according to housing officials. This benefit is unusual because the state pays for the security deposit rather than the renter, yet the LHA does not claim the refund; the disabled person can apply the refunded deposit to another rental unit if they choose.

Housing search support and accessibility funding

According to one state housing official, an additional \$500 per month for each housing applicant is also available to LHAs to pay for housing navigation and supplement expenses related to the housing search and moving in. The funds can pay someone to advocate with property owners, help applicants navigate the process of applying for units, and explain how the AHVP voucher works. The money can also pay for transportation so prospective renters can visit available units, cover the cost of moving expenses, or pay a broker's fee.

Only some LHA officials we interviewed were aware of this funding. However, when they take advantage of the resource, the chances are improved that low-income disabled renters with an AVHP voucher can successfully lease once they have found a suitable unit. Such supplemental support is vital for most low-income people, who typically cannot afford these additional expenses and, therefore, risk losing an appropriate housing unit. It is also a vital service for people living in institutions

who do not have access to computers to search for rentals or transportation and related assistance to view available rentals.

Given our housing market, no one is getting folks into units super easily, but we're offering to pay \$500 a month per client for housing search, which is not an insubstantial amount of money, so we're really hoping that helps. What we've seen, not just with AHVP but across voucher programs, it's confusing and it's stressful, and just having someone to help you navigate applying for units and advocating with property owners and explaining the voucher and speaking on your behalf can just be a game changer....

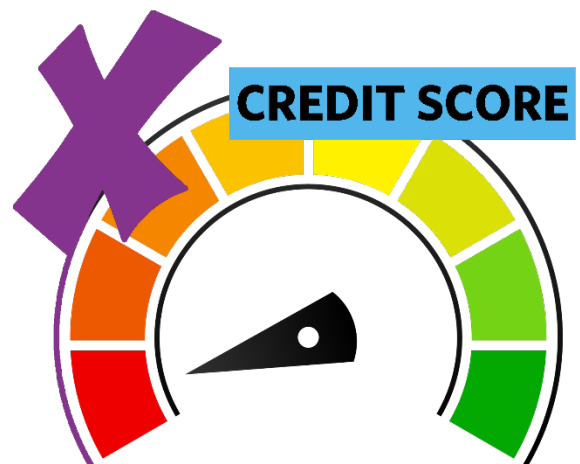
— *State housing official*

Recognizing how few rental units are accessible, the Massachusetts legislature appropriated \$2.5 million in 2023 that will pay up to \$100,000 per project to create accessible housing or rehabilitate inaccessible housing to achieve access. Participating developers and landlords must agree to rent to an AHVP voucher holder when the accessible unit becomes available.¹³ One state housing official noted that plans were also underway for the Massachusetts Division of Rental Assistance, beginning in July 2024, to make \$10,000 available to reimburse landlords who make accessibility modifications to their rental units for tenants who require adaptations such as ramps or changes to the bathroom.

Challenges

Credit checks, holding fees, and health inspections

State officials, housing authority directors, and advocates noted that landlords often require credit verification for prospective tenants even when the state guarantees permanent payment of a substantial portion of the voucher holder's monthly rent. Credit checks create a barrier that makes it nearly impossible for low-income disabled individuals who might have poor or limited credit to lease a unit in the



private housing sector, even with a voucher. Furthermore, most large apartment complexes charge a \$500 “holding fee” (Massachusetts does not allow an application fee) to apply for a unit. If the individual does not qualify for the unit, they get the money back, but if they qualify, the landlord applies it as a rent credit. However, that amount could be the portion of the rent disabled individuals would pay for several months and could, therefore, affect their ability to pay for essentials such as utilities, food, and other necessities.

Lack of housing navigation assistance

Several housing authority officials noted that AHVP applicants have diverse functional limitations and disabilities. Many of them can complete the required paperwork and provide documents that establish eligibility. In contrast, others—especially those living in nursing facilities—were not able to find rental units even if they have a voucher because they do not have adequate support to do so.

Prospective renters must use their vouchers within 120 days of being issued, and LHAs can give a 30-day extension under certain circumstances. Even so, one official remarked that at least a dozen disabled people from their jurisdiction qualified for a voucher but could not find an affordable, accessible unit within the time limits and, consequently, their vouchers expired. These individuals

faced numerous barriers, including commercial rents that exceeded the value of the voucher, lack of physical accessibility, required credit checks, holding fees, and move-in expenses they could not afford.

Advocates acknowledged that the current \$500 monthly allocation per person for navigation assistance would be helpful if LHAs knew it was available and used it (see discussion above). However, it was sometimes inadequate to pay additional fees and moving expenses, and for the time navigators needed to assist prospective renters



and manage the complex activities related to renting and moving into a housing unit. One state official observed that because AHVP does not include these services, the program needs a dedicated partner who helps with the housing search so voucher holders can use the rent subsidy successfully. Illustrating the problem, one housing official said:

I have someone right now whose voucher is set to expire the end of this month. They're in a nursing home. They've been there for multiple years.... They're in a wheelchair, so they need an ADA unit, and they haven't even applied for one place. They don't have the ability; they don't have a computer. The nursing home isn't helping. They don't have family. So, I think that sometimes the people that really would benefit [from a AHVP voucher] are kind of slipping through the cracks.

Cost and administrative burden of health inspections

One housing authority official reported that local health boards require that rental units leased using AHVP vouchers must pass a formal health inspection. Unlike the federal Housing Choice Voucher program, also administered by LHAs, which typically supports an independent infrastructure to carry out such inspections, LHAs must arrange and pay for the inspections when an AHVP recipient leases a housing unit. This requirement creates challenges for some smaller LHAs that do not have the in-house capacity to perform the inspections.

Communication among LHAs

Several LHA directors observed that fewer than thirty towns in Massachusetts participate in the AHVP. Yet, Massachusetts' Department of Housing and Community Development (DHCD) has never convened them as a group. These officials noted that sharing resources and information about program implementation would boost their capacity to improve services for disabled AVHP applicants. Moreover, staff would benefit from learning how other jurisdictions are handling specific issues, such as reasonable-accommodations requests, extensions of time beyond the legal limit to locate a suitable rental unit after a voucher has been

issued, and identification of resources that might help remove accessibility barriers or pay for moving expenses.

Discrimination

Advocates, state housing agency officials, and LHA directors observed that another significant barrier to finding affordable and accessible housing was landlord discrimination based on the potential lessee's source of income, although state law has prohibited such discrimination since 1989.¹⁴ Even as AHVP guarantees rent payment for low-income disabled applicants, some landlords and management companies will not accept a tenant even if their rent would be paid primarily by a reliable publicly funded voucher. Some advocates suggested that this bias can extend to the prospective disabled renter when landlords misperceive them as undesirable tenants. As one advocate put it, "They are looking for proof that you are worthy."

Uniqueness

According to the National Low Income Housing Coalition's database "State and City Funded Rental Housing Programs," twenty states offer low- and very low-income disabled people some emergency or ongoing rental assistance, including state-funded temporary or permanent rental subsidies for people transitioning to the community from nursing facilities.¹⁵ While some of these programs are similar to AHVP, none appear to focus exclusively on low-income disabled people under age 60 and most have lower income-eligibility thresholds. In some cases, programs focus on one or more disability categories, such as people with serious mental health disabilities or people who are HIV-positive. Other rent-subsidy programs are temporary, and applicants must be on waiting lists for federal rental vouchers to qualify. Some programs focus on older and disabled people together. The following examples of ongoing state housing subsidies or voucher programs illustrate some of these similarities and differences.

California

Housing and Disability Advocacy Program

California enacted legislation in 2016 that established the Housing and Disability Advocacy Program (HDAP). The program aimed to help unhoused people or those at risk of losing their housing and who were likely to be eligible for federal disability benefits, including Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI). HDAP intended to serve as a bridge until beneficiaries could establish eligibility for disability benefits that they could use to pay rent or until they could acquire alternative housing subsidies or vouchers. HDAP services included interim-shelter assistance, rental assistance, housing navigation, case management, security deposits, utility payments, moving costs, legal services, and credit repair. It became permanent in 2020 with an annual appropriation of \$25 million. The California legislature, in 2022, appropriated an additional \$175 million in addition to the annual appropriation of \$25 million with a dollar-for-dollar match requirement. As of 2022, 57 counties and two tribal agencies participated in HDAP.¹⁶

Iowa

Home and Community-Based Services Rent Subsidy Program

The Iowa legislature, in 2005, created the Home and Community-Based Services Rent Subsidy Program. The program provided temporary rental assistance to community-dwelling disabled people who received Medicaid home and community-based services until they could obtain other public or private rental assistance. Eligible disabled people were required to pay 30% of their income toward rent. The Iowa Finance Authority paid the difference between that contribution and the fair market rent (FMR) for a one-bedroom apartment. Each program participant received about \$175 per month towards rent. The program has helped approximately 350 individuals annually since it began with an appropriation of \$700,000. Funding decreased to \$658,000 in 2015.¹⁷

Missouri

Rental Assistance Program (RAP)

The Missouri Department of Mental Health (DMH) provides rental subsidies to people receiving mental health services or substance use disorder services provided by a DMH-contracted provider agency. The Rental Assistance Program (RAP) provides one-time assistance to prevent eviction and help families and households move into affordable rental housing. RAP intends to support households with adequate financial resources to pay rent once they have received RAP assistance. Household rent and utilities must not exceed 50% of the recipient's income or the value of a permanent housing voucher such as a federal Housing Choice Voucher.

Supportive Community Living Program

Missouri's Supportive Community Living Program places individuals with serious mental illness into permanent housing through a network of contract providers. The applicant's household must be unstable, with a realistic possibility that one-time assistance can improve the situation. A state housing voucher modeled after the federal Housing Choice Voucher helps subsidize rental units. Approximately 3,000 adults participate in the program every year. They contribute 30 percent of their income towards rent and must have a household income of no more than 50 percent of the Area Median Income (AMI). Applicants must also be on waiting lists for federally subsidized assistance.¹⁸

North Carolina

Key Program

The Key Program, in partnership with the North Carolina Housing Finance Agency, ensures that affordable rental units are set aside for extremely low-income households headed by adults with disabilities. The program is part of a broader initiative to make 10 percent of the federal Low-Income Housing Tax Credit units accessible to extremely low-income persons with disabilities. Key Program services provide operating assistance to properties that do not have another form of rental

assistance to ensure the units are affordable to people with incomes as low as Supplemental Security Income (SSI). It pays the difference between what a person on SSI income can afford to pay as rent and a statewide operating standard. Key Rental Assistance is only available in properties that participate in the Targeting Program, which provides affordable housing for people with disabilities and/or experiencing homelessness with very low incomes.

Structural Barriers to Housing

Massachusetts, like many other states, has an acute housing shortage, especially rental homes that very low-income disabled individuals can afford. Ten-year trends illustrate that the number of affordable rentals dropped while higher-cost rentals soared. According to the Harvard University Joint Center for Housing Studies, the supply of rentals in Massachusetts available for under \$600 per month dropped from just over 206,000 in 2011 to 168,402 in 2021. In comparison, 89,761 rental units costing \$2,000 per month and higher were available in 2011 while 248,359 additional such units had been created by 2021, significantly outpacing the availability of lower-cost units.^{19, 20}

In this market, recent estimates suggest that Massachusetts needs over 175,000 additional rental units to house people with very low incomes, including disabled people.²¹ Extremely low-income disabled people including those living on Supplemental Security Income (SSI) have been especially hard hit. In 2022, a disabled individual living in Massachusetts who received \$955 in monthly SSI benefits would have to pay an average of \$1,595 for a one-bedroom unit in the non-subsidized rental market.²² Moreover, limited availability of accessible housing added to the challenges renters with certain mobility limitations face in



the state's rental market. Research on housing accessibility showed that only about 1

percent of U.S. housing stock was accessible to wheelchair users, and about 5 percent was accessible to individuals with moderate mobility limitations.²³

Among extremely low-income U.S. renter households, 18 percent of residents are disabled people. Low-income households that include a disabled person are often severely cost-burdened and are more likely than households with more resources to spend more than half their income on housing. Disabled people living in these households who need home and community-based services to carry out activities of daily living such as bathing, dressing, and eating have the worst housing scenarios. Such households are likelier than others to forego healthy food and healthcare so they can pay the rent. Such households also frequently live in sub-standard dwellings, are exposed to toxic substances and neighborhood violence, and experience unstable housing that leads to evictions, homelessness, and institutionalization.²⁴ Too little affordable housing and minimal physical accessibility of rentals have caused dire housing inequities for low-income disabled people, underscoring the vital role rent subsidies play and the urgent need for more federal and state rental assistance.²⁵

Conclusion

Extensive research has shown that rental assistance significantly reduces housing instability, homelessness, and institutionalization for low-income disabled people. However, unlike Medicaid and some other federal programs, housing rental subsidies are not an entitlement. Not all people who are eligible receive rental assistance, and rental voucher availability does not expand or contract based on need. Inadequate federal funding has led to long waiting lists and prospective renters often wait months or even years to receive a rental voucher. The pressing need for additional rental support in the U.S. has left hundreds of thousands of disabled people living in substandard housing, in costly and restrictive institutions, and unhoused on the streets.²⁶

The growth of the Massachusetts AHVP program since its inception in 1995 exemplifies how states can supplement inadequate federal housing subsidies. It reflects a promising response to the rapidly growing need of low-income disabled

people for rental support. Stakeholders we interviewed also said that a robust increase in state AHVP vouchers would help more low-income disabled renters close the widening gap between market-rate rents and their monthly income. Moreover, the focus of AHVP on disabled people under age 60 acknowledges the unique and pervasive barriers younger disabled people experience in the commercial housing market, such as lack of accessibility and disability bias and discrimination. As the program grew and LHAs became more familiar with it, advocates also saw an opportunity to expand its impact. They have recently recommended that the state allow LHAs to assign the subsidies to specific new housing construction projects. Referred to as “project-based,” assignment of the vouchers would spur the construction of new, deeply affordable and accessible homes in the same way some federal housing vouchers are used. A mix of tenant and project-based AHVP vouchers will increase housing choices and expand the state’s stock of affordable and accessible homes.²⁷

AHVP represents a promising practice that other states could adopt. However, remedying the structural barriers that have created affordable housing shortages requires taxation, zoning, and land-use policy reforms. Until these systemic changes occur, state housing subsidies are fundamental to ensuring housing opportunities and housing equity for disabled people.

Notes

¹ Advocates we interviewed reported that AHVP vouchers resembled some federal vouchers available from the US Department of Housing and Urban Development (HUD), such as Mainstream rental vouchers for non-elderly persons with disabilities and Housing Choice Vouchers aimed at families and other eligible groups, but these vouchers were in short supply. For instance, since 2018, HUD has awarded over \$500 million in funding to public housing agencies (PHAs) nationwide to support 50,000 new Mainstream vouchers, far too few to meet growing state demand for rental assistance in Massachusetts.

² By 2023, Massachusetts would have about 44,000 units of public housing.

³ Brandeis University, Committee for Protection of Human Subjects. (2019, November 8). “IRB Protocol #20048R-E Caldwell: Understanding Barriers and Facilitators to Increasing Affordable Housing for People with Disabilities.”

⁴ Citizen’s Housing and Planning Association (CHAPA). (2023). “CHAPA’s FY2024 Budget Priorities.” <https://www.chapa.org/sites/default/files/chapa-priorities-items-2023/chapa-budget-priority-chart-fy2024-signed-by-the-governor-8.9.23.pdf>.

⁵ Unpublished chart of program funding and utilization from the Executive Office of Housing and Livable Communities. (2023, May).

⁶ Commonwealth of Massachusetts. “State Public Housing Programs.” <https://www.mass.gov/service-details/alternative-housing-voucher-program-ahvp>.

⁷ Commonwealth of Massachusetts. “State Public Housing Programs.” <https://www.mass.gov/service-details/alternative-housing-voucher-program-ahvp>.

⁸ Commonwealth of Massachusetts. “Budget Summary.” <https://budget.digital.mass.gov/summary/fy23/enacted/housing-and-economic-development/housing-and-community-development/70049031>.

⁹ U.S. Department of Housing and Urban Development. “Housing Choice Fact Sheet.”

https://www.hud.gov/topics/housing_choice_voucher_program_section_8#:~:text=In%20general%2C%20the%20family's%20income,of%20the%20area%20median%20income.

¹⁰ Commonwealth of Massachusetts. “State Public Housing Programs.”

[https://www.mass.gov/info-details/state-public-housing-programs.](https://www.mass.gov/info-details/state-public-housing-programs)

Applicants must also be eligible and qualified for the c. 667 elderly/handicapped state-aided housing program.

¹¹ Massachusetts Regulations 760 CMR 5.07 – “Eligibility of Handicapped Persons.”

[https://www.law.cornell.edu/regulations/massachusetts/760-CMR-5-07.](https://www.law.cornell.edu/regulations/massachusetts/760-CMR-5-07)

The regulation defines disability as follows:

“(1) A handicapped person of low income, as so defined, may have one or more physical or mental impairments, which shall be considered in conjunction with each other if more than one exists.”

“(2) The LHA shall determine whether non-elderly applicants for elderly/handicapped housing are handicapped persons of low income. Upon request, the applicant shall provide documentation sufficient for the LHA to be able to make a determination of eligibility. Such documentation shall be subject to third-party verification. As part of the determination process the following actions and findings are necessary.

(a) The applicant shall provide certification by a physician documenting a physical or mental impairment which is expected to be of long and continued duration, but at least for more than six months;

(b) the LHA shall determine that either certain special architectural design features or low-rent housing are not available in the private market and that the applicant is faced with living in an institution or decadent, substandard housing, or paying excessive rents; and

(c) the LHA shall determine an applicant to be of low income if the applicant's household income is within the income limits set for state-aided public housing.

(3) Examples of a person with a qualifying physical impairment which may substantially impede his or her ability to live independently in conventional housing shall include, but shall not be limited to, a person:

(a) who is confined to a wheelchair;

(b) who, because of the use of braces or crutches, or because of the loss of a foot or leg, or because of an arthritic, spastic, pulmonary or cardiac condition walks with significant difficulty or insecurity;

(c) who, due to a brain, spinal or peripheral nerve injury, suffers from significant coordination deficits;

(d) who is blind within the definition of blind person set out in 111 CMR 3.03: Definitions;

(e) who is deaf within the definition set out in M.G.L. 6, § 191; or

(f) who has a developmental disability which prevents the person from living totally independently and would benefit from the LHA's specialized housing (such a person may include, but is not limited to, a person with cerebral palsy, mental retardation, or epilepsy)."

¹² Commonwealth of Massachusetts. "State Public Housing Programs."
<https://www.mass.gov/info-details/state-public-housing-programs>.

¹³ Commonwealth of Massachusetts. General Appropriations Act, Housing and Economic Development, Housing and Community Development, 7004-9031 - Accessible Affordable Housing Grants. (2023).
<https://budget.digital.mass.gov/summary/fy23/enacted/housing-and-economic-development/housing-and-community-development/70049031>.

¹⁴ Massachusetts General Laws. Ch. 151B, § 4, “Unlawful Practices.” <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXXI/Chapter151B/Section4>.

¹⁵ National Low Income Housing Coalition. “State and City Funded Rental Assistance Housing Programs.” <https://reports.nlihc.org/rental-programs/search/rental-assistance>.

¹⁶ State of California, California Department of Social Services. “Housing and Disability Advocacy Program.” <https://www.cdss.ca.gov/inforesources/cdss-programs/housing-programs/housing-and-disability-advocacy-program>.

¹⁷ Iowa Admin. Code r. 265-24.1. <http://www.ime.state.ia.us/HCBS/HCBSindex.html>

¹⁸ State of Missouri, Department of Mental Health. “Rental Assistance Program.” <https://dmh.mo.gov/housing/unit/rental-assistance>.

¹⁹ Joint Center for Housing Studies of Harvard University, Harvard Graduate School of Design and Harvard Kennedy School. (2023). “The State of the Nation’s Housing 2023.” https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard_JCHS_The_State_of_the_Nations_Housing_2023.pdf.

²⁰ Harvard Joint Center for Housing Studies. “Tabulations of US Census Bureau, American Community Survey 1-Year Estimates.” <https://www.jchs.harvard.edu/son-2023-low-cost-rentals>.

²¹ National Low Income Housing Coalition. “Housing Needs by State, State Data Overview: Massachusetts (NLIHC tabulation of 2021 ACS PUMS).” <https://nlihc.org/housing-needs-by-state>.

²² Technical Assistance Collaborative (TAC). (2022). “Priced Out: The Housing Crisis for People with Disabilities.” <https://www.tacinc.org/resources/priced-out/>.

²³ U.S. Department of Housing and Urban Development, Office of Policy Development and Research. (2015, March 19). “Accessibility of America’s Housing

Stock: Analysis of the 2011 American Housing Survey (AHS).”

<http://dx.doi.org/10.2139/ssrn.3055191>.

²⁴ T. Meschede, K. Trivedi, & J. Caldwell. (2023). “Severe housing and neighborhood inequities of households with disabled members and households in need of long-term services and supports.” *Housing and Society*, 50(2), 228–251.

<https://doi.org/10.1080/08882746.2022.2065614>.

²⁵ E. Haber & D. Bianchi. (2023, September 17). “Massachusetts can build a triple threat to attack the housing crisis.” *Banker and Tradesman*.

<https://bankerandtradesman.com/massachusetts-can-build-a-triple-threat-to-attack-the-housing-crisis/>.

²⁶ A. Bailey, R. de la Huerga, & E. Gartland. (2021). “More housing vouchers needed to help people with disabilities afford stable homes in the community.” Center on Budget and Policy Priorities.

<https://www.cbpp.org/sites/default/files/7-6-21hous.pdf>.

²⁷ Citizen’s Housing and Planning Association (CHAPA). (2023). “CHAPA’s FY2024 Budget Priorities.”

<https://www.chapa.org/sites/default/files/chapa-priorities-items-2023/chapa-budget-priority-chart-fy2024-signed-by-the-governor-8.9.23.pdf>.

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