

May 16, 2025

Public Comments on Proposed Amendments to Emergency Assistance Shelter Regulations

The undersigned are attorneys and a postgraduate fellow from four Boston University School of Law clinical legal programs: the Antiracism and Community Lawyering Practicum, the Immigrants' Rights and Human Trafficking Program, the Criminal Law Clinical Program, and the Civil Litigation and Justice Program.¹ We submit these comments regarding the proposed amendments to regulation 760 CMR 67.02, which governs eligibility for Emergency Assistance (EA). These amendments were adopted by the Executive Office of Housing and Livable Communities (EOHLC) on March 14, 2025, and April 11, 2025.

We urge EOHLC to revise these proposed amendments, which are not only arbitrary and capricious, but will also import racial biases from the criminal legal system into the family shelter system. The proposed amendments would require EA shelter applications to consent to a criminal records check and would automatically exclude a person over the age of 18 from EA benefits if that person has been convicted of certain enumerated offenses.² The proposed amendments rest on the false premise that a person's criminal record is indicative of their propensity towards dangerousness. On the contrary, criminal records reflect a variety of factors—including racially biased policing and prosecution practices and other structural inequities—that are wholly unrelated to community safety. Moreover, the proposed amendments pose a particular risk of arbitrarily excluding survivors of domestic violence, abuse, and trafficking from emergency shelters, which is especially concerning where survivors require such shelter as a means of escaping violence.

While the legislature has required EOHLC to incorporate CORI checks as part of its EA shelter application process, EOHLC's proposed amendments include minimal opportunities for applicants to present mitigating evidence and go even further than the legislature requires by automatically excluding applicants with certain enumerated prior convictions. These provisions are contrary to any legitimate state interest and we urge you to withdraw them.

I. The proposed regulatory amendments will inevitably result in racially biased denials of shelter.

The Commonwealth's criminal record system, CORI, reflects the influence of racial biases and structural racism during each stage of the criminal legal process.³ By requiring a CORI check as a condition of admission to the EA shelter system—and, even worse, automatically disqualifying people for admission to shelters based on certain prior convictions—the proposed

¹ This comment does not represent the official views of Boston University or Boston University School of Law.

² 760 CMR 67.02 (13)-(15).

³ CORI stands for Massachusetts Criminal Offender Record Information, and "includes arrest records along with records of conviction." *Reddicks v. Alves*, 23-10455, 2024 WL 5009065, at *9 (D. Mass. Dec. 4, 2024).

amendments to regulation 760 CMR 67.02 effectively import racial biases from the criminal legal system into the EA shelter system and will inevitably result in racially biased denials of shelter.

In the criminal legal context, racism manifests through “a combination of police practices and legislative and executive policy decisions” that “systematically” treat Black people and other people of color more harshly than White people.⁴ This differential treatment may be explained in part by research regarding implicit bias—unconscious associations identified through someone’s actions, even if they are not aware they hold biased beliefs.⁵ Indeed, research regarding cognitive biases has revealed ways that people unconsciously and unwarrantedly associate Blackness with criminality and violence.⁶

Consequently, Black people in the Commonwealth experience disparate treatment at several junctures of the criminal legal process—a reality that the Massachusetts Supreme Judicial Court has explicitly and repeatedly recognized.⁷ Research shows that police are more likely to perceive Black neighborhoods as “high-crime,”⁸ and there is a well-documented history of hyper-surveillance and a concentration of police interactions and arrests within Massachusetts’s Black communities.⁹ Black people are more likely to be pulled over while driving,¹⁰ more likely to be

⁴ Michael Tonry, *The Social, Psychological, and Political Causes of Racial Disparities in the American Criminal Justice System*, 39 CRIME & JUST. 273, 274 (2010).

⁵ See *Commonwealth v. Long*, 485 Mass. 711, 734 (2020); *Commonwealth v. Buckley*, 478 Mass. 861, 878 (2018) (Budd, J., concurring).

⁶ See *Commonwealth v. Sweeting-Bailey*, 488 Mass. 741, 770 & n.9 (2021) (Budd, C.J., dissenting) (quoting *Buck v. Davis*, 137 S. Ct. 759, 776 (2017) (describing the “powerful racial stereotype” that Black men are “violence prone”); see also, e.g., Ctr. for Law, Brain & Behavior at Mass. General Hospital, *White paper on the science of late adolescence: A guide for judges, attorneys, and policy makers* 22-23 (2022), <https://clbb.mgh.harvard.edu/wp-content/uploads/CLBB-White-Paper-on-the-Science-of-Late-Adolescence.pdf> (discussing perceptions of Black children as older and more threatening than similarly aged White children); Carlos Berdejo, *Criminalizing Race: Racial Disparities in Plea Bargaining*, 59 B.C. L. REV. 1187, 1191-98, 1237-38 (2018) (demonstrating empirically that in “low information” cases, Blackness may be used as a proxy for criminality); Jennifer Eberhardt et al., *Seeing Black: Race, Crime, and Visual Processing*, 87 J. PERSONALITY & SOC. PSYCH. 876, 878, 889-891 (2004) (discussing research demonstrating stereotypic associations between Black people and criminality).

⁷ See, e.g., *Commonwealth v. Buckley*, 478 Mass. 861, 876–77 (2018) (Budd, J., concurring) (“Years of data bear out what many have long known from experience: police stop drivers of color disproportionately more often than Caucasian drivers for insignificant violations (or provide no reason at all).”); *Commonwealth v. Laltaprasad*, 475 Mass. 692, 702 (2016) (“[D]ata concerning convictions for drug offenses in Massachusetts raise a serious concern about the disparate impact of mandatory minimum sentences on defendants who are part of racial or ethnic minority groups.”); *Commonwealth v. Feyenord*, 445 Mass. 72, 88 (2005), cert. denied, 546 U.S. 1187 (2006) (Greaney, J., concurring) (discussing “humiliating, painful, and unlawful” police encounters targeting Black and Latinx people); *Commonwealth v. Arriaga*, 438 Mass. 556, 571 (2003) (“Racial and ethnic bias in the Massachusetts courts is an issue of long-standing concern.”); *Commonwealth v. Gonsalves*, 429 Mass. 658, 670 (1999) (Ireland, J., concurring) (citing studies on disparate traffic stops of Black and Latinx people); Elizabeth Tsai Bishop, et al., Harvard Law School Criminal Justice Policy Program, *Racial Disparities in the Massachusetts Criminal System*, 1-2 (2020), <https://hls.harvard.edu/wp-content/uploads/2022/08/Massachusetts-Racial-Disparity-Report-FINAL.pdf> (discussing data analysis showing racial disparities in criminal charging practices).

⁸ See, e.g., Ben Grunwald & Jeffrey Fagan, *The End of Intuition-Based High-Crime Areas*, 107 CAL. L. REV. 345, 352 (2019); Lincoln Quillian & Devah Pager, *Black Neighbors, Higher Crime? The Role of Racial Stereotypes in Evaluations of Neighborhood Crime*, 107 AM. J. SOC. 717, 718 (2001).

⁹ See Jeffrey Fagan et al., *Stops and Stares: Street Stops, Surveillance, and Race in the New Policing*, 43 FORDHAM URB. L.J. 539, 592 (2016) (discussing empirical research regarding Boston Police Department practices and finding that the “pattern of race effects suggests evidence of disparate treatment in [stop and search] activity based on

arrested for drug offenses,¹¹ and more likely to be wrongfully convicted of murder from police misconduct.¹² Moreover, children of color are more likely to be arrested for what would be seen as “kids being kids” when done by White children.¹³ Despite making up only 24% of the population, Black Bostonians are subject to 63% of police encounters.¹⁴

After an arrest, biases continue to impact criminal legal outcomes when it comes to charging decisions.¹⁵ Data show that prosecutors impose harsher pretrial and bail recommendations on Black arrestees.¹⁶ Black people are more likely to be detained pretrial¹⁷ and are more likely and to face higher bail amounts.¹⁸ All of these factors exert disproportionate pressure on Black people accused of crimes to plead guilty, even if they are not. Against this backdrop, it is no

neighborhood racial composition”); ACLU of Massachusetts, *Black, Brown and Targeted* (2014), <https://www.aclum.org/sites/default/files/wp-content/uploads/2015/06/reports-black-brown-and-targeted.pdf> (discussing racial bias in the Boston Police Department’s practices); The Boston Indicators Project, MassINC & the Mass. Criminal Justice Reform Coalition, *The Geography of Incarceration: The Cost and Consequences of High Incarceration Rates in Vulnerable City Neighborhoods* 3 (Oct. 2016) (finding that “[t]hroughout Boston’s communities of color, incarceration rates are much more elevated than crime rates”).

¹⁰ Commonwealth v. Buckley, 478 Mass. 861, 876–77 (2018) (Budd, J., concurring); Commonwealth v. Gonsalves, 429 Mass. 658, 670 (1999) (Ireland, J., concurring).

¹¹ Ashley Nellis, The Sentencing Project, *The Color of Justice: Racial and Ethnic Disparity in State Prisons* 14 (2021), <https://www.sentencingproject.org/app/uploads/2022/08/The-Color-of-Justice-Racial-and-Ethnic-Disparity-in-State-Prisons.pdf> (citing research findings that “Black and white individuals use and sell drugs at comparable levels but Black people are nearly four times as likely as whites to be arrested for drug offenses and 2.5 times as likely to be arrested for drug possession”).

¹² Samuel R. Gross et al., Nat’l Registry of Exonerations, *Race and Wrongful Convictions in the United States* 6 (Sept. 2022), [https://exonerationregistry.org/sites/exonerationregistry.org/files/documents/Race_and_Wrongful_Convictions-2%20\(1\).pdf](https://exonerationregistry.org/sites/exonerationregistry.org/files/documents/Race_and_Wrongful_Convictions-2%20(1).pdf) (finding that Black people are significantly overrepresented among exonerees and that “[o]fficial misconduct is more common in murder convictions that lead to exonerations of black defendants than in those with white defendants”).

¹³ Mass. Juv. Just. Pol’y & Data Bd., *Racial and Ethnic Disparities at the Front Door of Massachusetts’ Juvenile Justice System: Understanding the Factors Leading to Overrepresentation of Black and Latino Youth Entering the System* 3–4 (2022), <https://www.mass.gov/doc/racial-ethnic-disparities-at-the-front-door-of-massachusetts-juvenile-justice-system-understanding-the-factors-leading-to-overrepresentation-of-black-and-latino-youth-entering-the-system/download>

¹⁴ Bishop et al., *supra* note 6, at 18.

¹⁵ See, e.g., Nellis, *supra* note 10, at 14 (“[P]rosecutorial charging decisions play out unequally when viewed by race, placing Blacks at a significant disadvantage to whites”); Angela Davis, *Prosecution and Race: The Power and Privilege of Discretion*, 67 *FORDHAM L. REV.* 13, 32–38 (1998) (discussing how unconscious biases and race-neutral prosecutorial decisionmaking may have a discriminatory impact).

¹⁶ See Bishop et al., *supra* note 6, at 23 (finding that, in Massachusetts, “[b]ail is set in a slightly higher percentage of cases involving Black and Latinx defendants as compared to White defendants” and “a slightly higher percentage of Black and Latinx defendants are detained without bail as compared to White defendants”); Frank McIntyre & Shima Baradaran, *Race, Prediction, and Pretrial Detention*, 10 *J. EMPIRICAL LEGAL STUD.* 741, 742 (2013) (finding based on data sample that Black felony state court defendants were 9 percentage points more likely to be detained pretrial than White felony defendants); Rob Smith & Justin Levinson, *The Impact of Implicit Racial Bias on the Exercise of Prosecutorial Discretion*, 35 *SEATTLE U. L. REV.* 795, 814 (2012) (citing studies showing that “[t]here is empirical evidence to suggest that, at least in some jurisdictions, minority defendants receive less favorable pretrial detention determinations than their white counterparts”).

¹⁷ Wendy Sawyer, Prison Policy Initiative, *How Race Impacts Who is Detained Pretrial* (Oct. 9, 2019), https://www.prisonpolicy.org/blog/2019/10/09/pretrial_race.

¹⁸ John M. MacDonald and Ellen A. Donnelly, *The Downstream Effects of Bail and Pretrial Detention on Racial Disparities in Incarceration*, 108 *J. CRIM. L. & CRIMINOLOGY* 775, 801 (2018).

surprise that Massachusetts incarcerates its Black residents at 7.9 times the rate of its White residents.¹⁹

People of color in Massachusetts may also be especially likely to have errors in CORI due to dismissed criminal charges. Criminal records systems are notoriously unreliable and filled with errors.²⁰ CORI records are created upon an arrest or criminal charge and are not deleted even if charges are dismissed.²¹ Since racial profiling and targeted policing in Black and Brown neighborhoods are more likely to lead to arbitrary arrests, Black and Brown people are more likely than White people to have their charges dismissed.²² As one federal judge put it, “a citizen whose sole brush with the law is his arrest at a boisterous party which got out of hand, the charges later dropped will continue to turn up as a ‘criminal offender’ though he is, of course, presumed innocent of his dropped charges and his conduct otherwise spotless . . . this group is disproportionately composed of people of color.”²³ These errors will lead to the serious risk that a person will be denied shelter based on an arbitrary or racially biased arrest.

The proposed amendments to the EA shelter regulations compound the effects of racism in the criminal legal system by permitting CORI checks to affect a person’s access to emergency shelter, including through automatic exclusions. Arrests and convictions already carry significant collateral consequences, including loss of housing and employment.²⁴ The proposed amendments double-down on these consequences by further locking people out of the emergency shelter system. The proposed amendments also expand the reach of collateral consequences to include not only individuals with criminal convictions but their family members. This outcome is cruel, inhumane, and cannot be justified by any legitimate state interest.

II. The proposed amendments would have a particular impact on criminalized survivors of domestic violence, abuse, or trafficking whose criminal convictions and housing instability both derive from their experiences of violence.

Survivors of domestic violence, abuse, and trafficking are exposed to both criminal convictions and housing instability, making them prime targets for exclusion from shelter pursuant to the proposed amendments to 760 CMR 67.02. Several studies have demonstrated that

¹⁹ Bishop et al., *supra* note 6, at 1.

²⁰ See generally Sarah Lageson, *Criminally Bad Data: Inaccurate Criminal Records, Data Brokers, and Algorithmic Injustice*, 2023 U. ILL. L. REV. 1771, 1775-81 (2023) (discussing types of error in criminal records).

²¹ Osborne Jackson et al., New England Public Policy Center, Federal Reserve Bank of Boston, *Reintegrating the Ex-Offender Population in the U.S. Labor Market: Lessons from the CORI Reform in Massachusetts* 5 (2017), available at <https://www.bostonfed.org/publications/new-england-public-policy-center-research-report/2017/reintegrating-the-ex-offender-population-in-the-us-labor-market.aspx>.

²² Aleksandar Tomic & Jahn K. Hakes, *Case Dismissed: Police Discretion and Racial Differences in Dismissals of Felony Charges*, 10 AM. L. & ECON. REV. 110, 111 (2008); Brief for the Boston University Center for Antiracist Research as Amicus Curiae, p. 23-24, *Thompson v. Clark*, et al., 596 U.S. ____ (2022).

²³ *Reddicks v. Alves*, 2024 WL 5009065 *9 (D. Mass. Dec. 4, 2024).

²⁴ U.S. Comm’n on C.R., *Collateral Consequences: The Crossroads of Punishment, Redemption, and the Effects on Communities* 60 (2019), <https://www.usccr.gov/files/pubs/2019/06-13-Collateral-Consequences.pdf>; Benjamin D. Geffen, *The Collateral Consequences of Acquittal: Employment Discrimination on the Basis of Arrests Without Convictions*, 20 U. PA. J. L. SOC. CHANGE 81, 82 (2017).

most women in prison experienced physical or sexual abuse prior to their incarceration.²⁵ Many women who experience intimate partner violence are coerced into participating in criminalized behavior or are forced to commit acts that are later criminalized while defending themselves or their families.²⁶ A 2020 national survey of women incarcerated for murder and manslaughter found that 76% of women surveyed were incarcerated as a direct consequence of surviving violence: 30% acted in protection of themselves or a loved one, 33% were convicted of crimes committed with a male partner, and 13% were coerced by an abuser or acted under duress from an abuser.²⁷ Survivors with criminal records are more likely to suffer housing instability and therefore need to access the EA shelter system.²⁸

The proposed amendments are particularly troubling because housing is often one of the most critical resources a survivor needs when attempting to escape a violent situation. Unlike others who may be able to temporarily rely on friends or family, many survivors are intentionally isolated by their abusers and have no informal support network to turn to, making access to EA shelters a literal lifeline.²⁹ The situation can be even more dire for survivors of color. Black and Brown survivors frequently encounter systemic racism and discrimination within the housing and shelter systems.³⁰ Many are turned away, discouraged from seeking help, or retraumatized by the very institutions meant to protect them. These inequities compound the effects of gender-based violence and criminalization, leaving survivors with no viable path to safety or recovery.

Yet the proposed amendments make no attempt to mitigate their impact on domestic violence survivors. Instead, they exempt CORI checks from EOHLC's discretionary right to waive pre-placement requirements for those facing "an imminent risk of domestic violence or child safety concerns."³¹ To deny a survivor emergency shelter because of a criminal record is to tell all

²⁵ Sarah Nawab, Prisoners' Legal Services of Massachusetts, *A Different Way Forward: Stories from Incarcerated Women in Massachusetts and Recommendations* 6-7 (July 11, 2022), https://plsma.org/wp-content/uploads/2022/07/PLS_A-Different-Way-Forward-2022_07_11.pdf (citing studies).

²⁶ See Savannah Jones, *Ending Extreme Sentencing Is a Women's Rights Issue*, 23 GEO. J. GENDER & L. 1, 3-4 (2022), https://www.law.georgetown.edu/gender-journal/wp-content/uploads/sites/20/2022/03/S.-Jones_Ending-Extreme-Sentences-is-a-Womens-Rights-Issue.pdf (noting that women may be coerced to participate in felony-murder offense due to intimate partner, and that women may engage in felony conduct to defend themselves from abuse); Melissa Dichter & Sue Osthoff, *Women's Experiences of Abuse as a Risk Factor for Incarceration: A Research Update*, Nat'l Online Resource Ctr. on Violence Against Women (2015), https://vawnet.org/sites/default/files/materials/files/2016-09/AR_IncarcerationUpdate.pdf (describing paths from abuse to incarceration, including use of violence in response to abuse or against abusive partner).

²⁷ Nawab, *supra* note 24, at 7 (citing Justine van der Leun, *No Choice But to Do It*, THE APPEAL, Dec. 17, 2020)).

²⁸ Jasmine Engleton, et. al, *Exploratory Examination of How Race and Criminal Record Relate to Housing Instability Among Domestic Violence Survivors* NP21407, Journal of Interpersonal Violence 2022, Vol. 37(21-22) NP21400–NP21410, <https://doi.org/10.1177/08862605211042626>

²⁹ Shanti Kulkarni & Evelyn Hill, Safe Housing Partnerships and the National Resource Center on Domestic Violence, *Understanding the Cycle of Housing Insecurity for Marginalized Survivors of Domestic and Sexual Violence* 8 (October 2020) <https://safehousingpartnerships.org/wp-content/uploads/2024/11/Understanding-the-Cycle-of-Housing-Insecurity-for-Marginalized-Survivors-of-Domestic-and-Sexual-Violence.pdf>.

³⁰ See Shanti Kulkarni & Heidi Notario, *Trapped in Housing Insecurity: Socioecological Barriers to Housing Access Experienced by Intimate Partner Violence Survivors from Marginalized Communities* 52 J. COMMUNITY PSYCH. 439, 452 (2022); Bernadine Waller, et al., *Caught in the Crossroad: An Intersectional Examination of African American Women Intimate Partner Violence Survivors' Help Seeking*, 23 TRAUMA VIOLENCE ABUSE 1235, 1244 (2022).

³¹ See 760 CMR 67.06(1)(c)(2) (noting that the EOHLC may waive requirements "other than the consent to a CORI check and the Department's receipt of CORI information from DCJIS under 760 CMR 67.02(13)")

survivors that only those beyond reproach may receive necessary care, and the rest *deserve* to be unsafe because they are not “the ideal victim.”³² Or maybe worse, that the system does not believe, or care about, the abuse they have experienced.³³ Given ample research showing that survivors accurately perceive the immediate risks they face—as well as the increased risk that survivors face post-separation—survivors who present at shelters reporting such risk should be given housing without any delay or denial due to a CORI check.³⁴

Accordingly, the proposed amendments pose a great risk to survivors of violence and should be revised to exempt survivors from the CORI check requirement or otherwise mitigate the impact of this requirement on people who are seeking shelter to escape from violence.

III. The proposed amendments are arbitrary and disconnected from any legitimate public safety interest.

The proposed amendments are disconnected from any legitimate interest in a safe EA shelter system. For the reasons discussed above, criminal records reflect a variety of social dynamics and are not an accurate predictor of whether a person poses any risk to their community.³⁵ Moreover, excluding people from shelter promotes instability, thereby feeding into cycles of violence and harm rather than interrupting those cycles.

Further, the proposed amendments are arbitrary and capricious in their automatic exclusion of people with certain enumerated criminal convictions. For example, the proposed amendments automatically exclude a person from shelter if that person has been convicted of first or second degree murder.³⁶ The mandatory minimum sentence for first-degree murder in Massachusetts is life-without-parole and the mandatory minimum sentence for second-degree murder in Massachusetts is life with the possibility of parole after 15 years.³⁷ If a person with one of these

³² Jägervi, Lotta, *Who Wants to Be an Ideal Victim? A Narrative Analysis of Crime Victims' Self-Presentation*, 15 J. SCANDINAVIAN STUDIES IN CRIM. & CRIME PREVENTION 73, 85 (2014); Nils Christie, “The Ideal Victim,” in *FROM CRIME POLICY TO VICTIM POLICY* (1986)

³³ Deborah Epstein & Lisa A. Goodman, *Discounting Women: Doubting Domestic Violence Survivors' Credibility and Dismissing Their Experiences*, 167 U. PA. L. REV. 399, 406, 446 (2019); Melanie Randall, *Domestic Violence and the Construction of Ideal Victims: Assaulted Women's Image Problems in Law*, 23 ST. LOUIS U. PUB. L. REV. 107 (2004).

³⁴ Kathryn J. Spearman, Jennifer L. Hardesty, & Jacquelyn Campbell, *Post-separation Abuse: A Concept Analysis*, 79 J. ADV. NURSING 1225 (2022); Andrew M. Sherrill, Kathryn M. Bell, & Nicole Wyngarden, *A Qualitative Examination of Situational Risk Recognition Among Female Victims of Physical Intimate Partner Violence*, 22 VIOLENCE AGAINST WOMEN, 966, 977 (2016); Rosuara Gonzalez-Mendez & Juana D. Santana-Hernandez, *Perceived Risk and Safety-Related Behaviors After Leaving a Violent Relationship*, 6 EURO. J. OF PSYCH. APPLIED TO LEGAL CONTEXT 1, 5 (2014).

³⁵ Megan Kurlychek et. al, *Scarlet Letters and Recidivism: Does an Old Criminal Record Predict Future Offending?*, 5 CRIM. & PUB. POL. 483 (2006) (finding a similar risk of offending between those with a criminal record during their youth and those without by their mid-twenties); Shawn D. Bushway, et. al, RAND Corp., *Providing Another Chance: Resetting Recidivism Risk in Criminal Background Checks* vi (2022), https://www.rand.org/pubs/research_reports/RRA1360-1.html (finding that “[a] person’s likelihood of reoffending declines rapidly as more time passes without a conviction.”); Julia Angwin et. al, *Machine Bias*, PROPUBLICA (May 23, 2016), <https://www.propublica.org/article/machine-bias-risk-assessments-in-criminal-sentencing> (analyzing algorithmic bias in criminal forecasting software where Black offenders were given disproportionately higher scores than White offenders, despite actually recidivating at a lower rate).

³⁶ 760 CMR 67.02(14)(a)-(b).

³⁷ Mass. Gen. Laws Ann. ch. 265, § 2.

convictions is seeking emergency shelter, it stands to reason that they have either received parole or clemency after a significant term-of-years in prison, or they were released pursuant to a determination that their conviction or sentence was wrongful. Automatically excluding such a person from emergency shelter is non-sensical. If a parole board or the Governor has determined that this person poses no threat to society, then there is no reason for the EOHLC to contradict that determination. This is just one example that illustrates the proposed amendments' lack of empirical grounding, suggesting an approach to policymaking that is based in fear rather than reason.

* * *

In sum, the proposed amendments will import racial biases from the criminal legal system into the EA shelter system, wrongfully excluding people from shelter without advancing any legitimate public safety interest. We urge EOHLC to revise the amendments to eliminate automatic exclusion based on criminal records and to allow substantial opportunities for applicants to present mitigating evidence. We also urge the EOHLC to create exceptions for people who are seeking shelter to escape violent or unsafe living situations.

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