



Emergency Assistance Family Shelter Program Background Check Feasibility Study

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Executive Summary

Chapter 1, § 12 of the Acts of 2025¹ requires the Executive Office of Housing and Livable Communities (EOHLC) to complete the following:

The executive office of housing and livable communities, in coordination with the department of state police, shall study the feasibility of conducting a background check through the National Crime Information Center for each adult applicant or beneficiary placed in the emergency housing assistance program. The study shall include, but not be limited to, information on: (i) federal approvals necessary to conduct such background checks; (ii) projected costs for conducting such background checks; and (iii) any impediments to conducting such background checks, as determined by the executive office in consultation with the department of state police in the course of the study. The executive office of housing and livable communities shall submit a report summarizing the results of the study to the clerks of the senate and house of representatives and the senate and house committees on ways and means not later than July 1, 2025.

In recent months, EOHLC has engaged with the Executive Office of Public Safety and Security (EOPSS), the Massachusetts State Police, the Department of Criminal Justice Information Services (DCJIS), the Executive Office of Health and Human Services, the Department of Children and Families (DCF), the Executive Office of Education, and the Department of Early Education and Care (EEC) to study background checks conducted through the National Crime Information Center (NCIC). EOHLC also reviewed applicable federal and state laws, as well as the policies and procedures of other shelter programs across the country, including those in New York, California, Illinois, and Colorado.

We considered the following categories and topics:

- (1) The need to ensure safety and security at shelter sites;
- (2) Operational feasibility, including the impact on the eligibility determination and application processes;
- (3) Financial feasibility, analyzing the fiscal impediments throughout the lifecycle of an applicant to the EA Family Shelter program; and
- (4) Potential outcomes for families.

This feasibility study fulfills EOHLC's statutory obligation.

¹ An Act Making Appropriations for the Fiscal Year 2025 to Provide for Supplementing Certain Existing Appropriations and for Certain Other Activities and Projects, St. 2025, c. 1 (February 28, 2025).

Context

History of the Emergency Assistance Family Shelter Program

In 1983, Massachusetts created a one-of-a-kind family shelter system that provides temporary emergency shelter for families with children and pregnant individuals experiencing homelessness. The statute under which the program is administered, Section 30 of Chapter 23B of the Massachusetts General Laws, has been amended several times, and the modern iteration of this shelter system is the Emergency Assistance (“EA”) Family Shelter program. The EA Family Shelter program has contributed to one of the lowest rates of unsheltered family homelessness in the country. The mission of the program is to make homelessness rare, brief, and nonrecurring.

There are two tracks within the EA Family Shelter system – the Rapid Shelter Track and the Bridge Shelter Track. The Rapid Shelter Track provides 30 business days of shelter, absent specific waivers, serving families who have strengths and needs that allow them to find self-sufficient permanent housing more quickly with high intensity support. The Bridge Shelter Track is for families who have higher risks and more complex needs, and a family can stay at a shelter for up to six months, absent specific extensions or waivers. In either track, families are connected to shelter provider staff to help with case management, searching for housing, finding job placements and classes, and using stabilization services like HomeBASE.

In recent years, the EA Family Shelter program experienced an unprecedented surge in families seeking emergency shelter, driven both by federal policies on immigration and work authorization and a shortage of affordable housing in Massachusetts. The EA system that the Healey-Driscoll Administration inherited was not equipped to handle this surge. In August 2023, Governor Healey declared a state of emergency, as the EA Family Shelter program was projected to expand to over 13,000 families by the following year. Governor Healey implemented major policy reforms, including establishing a capacity limit, waitlist, and prioritization process; introducing a length of stay limit; requiring that all family members prove Massachusetts residency and intent to remain in Massachusetts; extending qualifying immigration status requirements to all family members, with limited exceptions; and requiring that all adults undergo a Criminal Offender Record Information (CORI) criminal background check and disclose prior criminal convictions prior to placement in shelter.

Over the course of 2024, the EA Family Shelter program served over 10,000 families, which is an increase over the more than 8,000 families served in the EA Family Shelter program over the course of 2023.

Background of Criminal History Checks in the EA Family Shelter Program

Prior to the Healey-Driscoll Administration, the EA Family Shelter program conducted checks for outstanding warrants and Sex Offender Registry Board (SORB) checks, but did not conduct a criminal history screening for applicants or participants.

SORB and Warrant Checks

Prior to placement, all individuals over the age of 10 are run through the SORB electronic database. Once in shelter, pursuant to 760 CMR 67.02(11), EOHLC conducts regular checks in the Massachusetts Warrant Management System, through electronic access facilitated by EOPSS and DCJIS, and requires individuals receiving benefits to resolve outstanding default or arrest warrants within five business days to continue receiving EA Family Shelter benefits.

CORI Checks

In January 2025, Governor Healey directed EOHLC to begin requiring CORI checks for all adults, 18 years of age or older, currently in the EA Family Shelter program and all new applicants, 18 years of age or older.^{2,3,4} Chapter 1, § 3 of the Acts of 2025 created a M.G.L. Ch. 23B, § 30(C½) to add the following:

- (1) The executive office shall require each individual adult applicant or beneficiary to disclose on their initial or subsequent application for emergency housing assistance benefits all prior criminal convictions and any pending charges for serious crimes, as defined by the executive office, whether in the commonwealth or another jurisdiction. The executive office shall not require prior convictions that have been sealed or expunged to be disclosed. Any adult applicant or beneficiary who fails to disclose prior criminal convictions and pending charges for serious crimes, as defined by the executive office, consistent with this paragraph shall not be eligible for benefits and any existing benefits shall be terminated.*
- (2) The executive office shall obtain criminal offender record information from the department of criminal justice information services for each individual adult applicant or beneficiary prior to placement into the emergency housing assistance*

² *Criminal Offender Record Information Policy for the Emergency Assistance Family Shelter Program:* <https://www.mass.gov/doc/ea-cori-policy-1/download> (April 11, 2025).

³ EOHLC is granted access to CORI by DCJIS to screen applicants and participants of the EA Family Shelter Program. M.G.L. Ch. 6, § 172(a)(6); 803 CMR 2.09(2).

⁴ EOHLC has Commissioner-approved CORI access. 803 CMR 2.05. This means, EOHLC receives Massachusetts criminal records for the following: all pending criminal charges, including cases continued without a finding of guilt until they are dismissed; all adult misdemeanor convictions and felony convictions; offenses for which the subject was adjudicated as an adult; and all convictions for murder, voluntary manslaughter, involuntary manslaughter, and sex offenses (as defined by M.G.L. c. 6, § 178C) punishable by a term of incarceration in state prison, unless sealed. 803 CMR 2.05.

program. An adult applicant or beneficiary who fails to consent to the executive office obtaining such criminal offender record information consistent with this paragraph shall not be eligible for benefits and any existing benefits shall be terminated. The executive office shall establish, through regulations, protocols on information received from the department of criminal justice information services.

- (3) *The executive office shall promulgate regulations placing limitations or exclusions on individuals found to have criminal convictions or pending charges for serious crimes, as defined by the executive office by regulation.*

On March 14, 2025, EOHLC filed an emergency amendment to the regulations governing the EA Family Shelter program, 760 CMR 67.00, pursuant to M.G.L. Ch. 23B, § 30(C½). The amendments were permanently adopted on June 6, 2025. The regulation provides procedures for review and analysis of all crimes. Certain serious crimes or pending charges result in mandatory exclusion from the EA Family Shelter program. 760 CMR 67.02(14). Other crimes or pending charges result in a presumptive exclusion from the EA Family Shelter program, with an opportunity for the applicant to provide reliable evidence demonstrating that they do not pose an unacceptable risk of harm to others in the EA Family Shelter Program. 760 CMR 67.02(15).

Additionally, in January 2025, EOHLC added questions to the EA Family Shelter program application and a self-attestation related to criminal history of adult applicants in any jurisdiction. For the period of April 15, 2025, to June 15, 2025, a total of 1,308 adults 18 years of age or older applied as a head of household or as a member of a family to the EA Family Shelter Program and submitted to CORI checks. Of those, 1.5% (20) were denied entry into shelter based on criminal convictions or pending charges pursuant to 760 CMR 67.02(14), (15).

To further strengthen safety and security practices throughout the EA Family Shelter program, Governor Healey asked the Edward Davis Company (EDC) to conduct a thorough investigation of existing practices. The policy changes summarized above, and others not detailed in this study, align with recommendations put forward in the “Massachusetts Emergency Assistance Shelter Security Assessment” conducted by the EDC. The report also included a recommendation to “develop and clearly communicate a standardized policy and procedure to process information from CORI and SORI checks to guide EOHLC resident placement decisions.”⁵ On January 27, 2025, EOHLC published the “Criminal Offender Record Information Policy for the Emergency Assistance Family Shelter Program” (CORI Policy). The CORI Policy is available on the EOHLC website⁶ and is translated into the five most commonly spoken languages among applicants to the EA Family Shelter program.

⁵ *Massachusetts Emergency Assistance Shelter Security Assessment: [EDC-EA-Shelter-Security-Assessment-022725.pdf](#)* (February 27, 2025).

⁶ *Criminal Offender Record Information Policy for the Emergency Assistance Family Shelter Program: <https://www.mass.gov/doc/ea-cori-policy-1/download>* (April 11, 2025).

Overview of Nationwide Practices for Criminal Background Checks for Homeless Shelters

As part of the analysis for this study, EOHLC considered the practices of other state or city homeless shelter programs. Below is a summary of our findings:

- **New York** offers a wide array of homeless shelters and services to support individuals and families facing housing instability, though the state as a whole does not have a guaranteed “right to shelter.” New York City, however, does operate under a legal “right to shelter” mandate, which states that all residents, including homeless individuals as well as families, immigrants and new arrivals, have a right to a safe place to sleep. Within the requirements for accessing temporary emergency shelter, there are no criminal background check requirements.
- In **California**, there are no right to shelter laws. Los Angeles’ guaranteed access to emergency shelter appears to be limited to extreme weather. This process is triggered by a qualifying extreme weather event, then individuals experiencing homelessness have 24 hours of housing with three meals included. The program does not require a background check to access this service.
- **Illinois** does not have right to shelter laws. For emergency shelter, in Chicago, an individual calls a hotline where they take an individual’s information and locate an emergency placement. The placement can take a couple of hours to a couple of days to secure. The program does not appear to require a criminal background check.
- In **Colorado**, there are no right to shelter laws. Denver, specifically, has some facilities that are available for emergency shelter. However, similar to Chicago, the state has an emergency hotline where individuals call and are connected with numerous resources. Utilizing the hotline does not guarantee placement, instead it serves as a centralized database. It appears that Denver defers to each shelter’s preference for application requirements for emergency shelter. EOHLC found no evidence of shelters first requiring a criminal background check prior to placement or thereafter.

The Federal System and Approval Process

The National Crime Information Center (NCIC), operated by the Federal Bureau of Investigation (FBI), is a digital index of criminal legal information, including nationwide information related to criminal record history,⁷ fugitives, stolen properties, and missing

⁷ The criminal history record information maintained in the system excludes arrests and court actions concerning nonserious offenses, such as disturbing the peace, loitering, or traffic violations, if not accompanied by an includable offense throughout the United States. 28 C.F.R. § 20.32. Moreover, though the system can show warrants, it does not show all outstanding warrants. Similarly, a CORI would not show a warrant for which the individual has not yet been arraigned in court.

persons.⁸ The data is a combination of information provided by the FBI, federal, state, and local agencies, and authorized courts. Agencies enter their records into NCIC, and they are maintained by the Criminal Justice Information Services (CJIS) Division of the FBI. The goal of the NCIC is to allow for prompt transmission of information about crimes or criminals to other agencies conducting an inquiry aiding in various agencies executing their duties.

Federal Public Law 92-544 states that, prior to initiating nationwide background checks through the NCIC for licensing or employment (*i.e.*, non-criminal justice agency) purposes, states must follow a two-step process: First, states must show that they are legislatively authorized to conduct nationwide background checks through the NCIC for the purpose at issue as a matter of state law. Second, and if so authorized, states must seek and receive approval from the FBI.⁹

Since 1972, the FBI, with the assistance of the United States Department of Justice, has determined the parameters of Pub. L. 92-544. The criteria are as follows:

- (1) The statute must exist as a result of a legislative enactment;*
- (2) It must require the fingerprinting of applicants who are to be subjected to a national criminal history background check;*
- (3) It must, expressly (“submit to the FBI”) or by implication (“submit for a national check”), authorize the use of FBI records for the screening of applicants;*
- (4) It must identify the specific category(ies) of licensees/employees falling within its purview, thereby avoiding overbreadth;*
- (5) It must not be against public policy; and*
- (6) It may not authorize receipt of the CHRI by a private entity.*

The FBI Office of the General Counsel, Criminal Justice Information Law Unit (CJILU) reviews state statutes seeking access to FBI criminal history record information (CHRI).¹⁰ State agencies wishing to submit statutes for review must work through their State Identification Bureau or appointed CJIS systems officer.¹¹

The FBI’s review of state statutes is also guided by 28 C.F.R. § 20.33(a), which describes the permissible uses of CHRI in the NCIC. As most relevant here, 28 C.F.R. § 20.33(a)(3) authorizes access to CHRI for licensing and employment purposes and for other uses for which dissemination is authorized by federal law. 28 C.F.R. § 20.33(a)(4) authorizes access to CHRI for “publicity designed to effect the apprehension of wanted persons in connection

⁸ *Law Enforcement Resources: National Crime Information Center (NCIC)*, <https://le.fbi.gov/informational-tools/ncic> (last visited June 23, 2025).

⁹ The FBI’s authority to collect this information is granted through 28 U.S.C. 534 and regulated through 28 C.F.R. § 20, which provides authority on what records can be acquired, how they can be shared, and who can access the information. 28 C.F.R. § 20 (2025). The laws for states utilizing the FBI’s criminal history record information (CHRI) are primarily focused on statutes where this data is requested for licensing, employment, and banking institutions that are federally insured to maintain security.

¹⁰ Public Law 92-544.

¹¹ In Massachusetts, this is the State Police.

with serious or significant offenses.” 28 C.F.R. § 20.33(a)(5) authorizes access to CHRI for “noncriminal justice governmental agencies performing criminal justice dispatching functions or data processing/ information services for criminal justice agencies.”

34 U.S.C. § 40102(a)(1) permits states to establish, via statute or regulation, authority to request a nationwide background check for the “purpose of determining whether a covered individual has been convicted of a crime that bears upon the covered individual’s fitness to have responsibility for the safety and well-being of children, the elderly, or individuals with disabilities.” 42 U.S.C. § 1437d(q) authorizes the use of NCIC background checks for federal public housing benefits.

In Massachusetts, EEC and DCF are two agencies that currently conduct nationwide background checks as part of their background check procedures. EEC runs the check for individuals applying for licenses for childcare centers and for all staff for group and school age childcare, residential programs, and placement agencies. DCF runs the checks for applicants to be foster parents. EEC and DCF use existing federal regulations specific to licensing and employment. M.G.L. Ch. 6, § 172O is the statute under which DCF conducts nationwide background checks, pursuant to 34 U.S.C. § 40102(a)(1). M.G.L. Ch. 15D, §§ 7, 8 are the statutes under which EEC conducts nationwide background checks, pursuant to 34 U.S.C. § 40102(a)(1).

In summary, and as a matter of federal law, EOHLIC could begin NCIC background checks for individuals in the EA Family Shelter program only if: (1) a new state law authorizing such background checks is enacted; and (2) the FBI reviews the enacted statute and determines that the language properly authorizes the background checks in accordance with federal statute and/or regulation.¹²

Federal Information Sharing

In general, under 5 U.S.C. § 552a(b)(7) and 28 U.S.C. § 534, criminal justice agencies—including local, state, and federal departments—maintain full access to the NCIC, including the ability to query NCIC files. These statutes broadly authorize the Attorney General of the United States, through the FBI, to collect and exchange criminal history and biometric data with federal, state, and local agencies for official law enforcement use. In addition, 8 U.S.C. § 1722(a)(2) mandates certain automatic data sharing, including automatic sharing of fingerprint data, from the FBI (via NCIC) to systems such as the Department of Homeland Security’s (DHS) Automated Biometric Identification System (IDENT), the Department of State’s Consular Consolidated Database, and the Department of Defense’s Automated Biometric Identification System (ABIS). With respect to DHS, this data-sharing framework is implemented through what is known as the “Secure Communities” program. *Makowski v. United States*, 27 F. Supp. 3d 901 (2014). Under this

¹² The FBI approval process can be time intensive. For example, the Massachusetts Gaming Commission waited for FBI approval for three years after their background check statute was enacted.

program, each time fingerprints are submitted to NCIC by a state or local agency, a second, simultaneous biometric search is run against DHS's IDENT system, providing automatic notification to ICE if an individual sought by that agency for immigration enforcement purposes has been fingerprinted. State and local agencies have no ability to limit this information sharing, and courts have upheld the legality of this process. *City of Philadelphia v. Sessions*, 309 F. Supp. 3d 289 (2018).

Requirements

To inform this feasibility study, EOHLC conducted informational conversations with subject matter experts from other Massachusetts state agencies, referenced above, currently using information obtained from NCIC.

While some of the state agencies consulted also provide social benefit programs, none utilize the check as a prerequisite to receiving public benefits. State agencies do use the NCIC as a prerequisite for employment or other activities related to the suitability to take responsibility over a child.

The below section outlines existing requirements and impacts on families prior to a determination on eligibility.

Existing EA Family Shelter Requirements

To be determined eligible for the EA Family Shelter program, families are required to meet several criteria, including but not limited to the following:

- The family must include a pregnant person or a child under the age of 21;
- The members of the family are residents of Massachusetts;
- The family's gross income must be at or below 115% of the Federal Poverty Guidelines for their family size;
- The family's assets (excluding a first car) must not exceed \$5000;
- The reason the family is applying for shelter must be one of the following:
 - No fault fire, flood, natural disaster;
 - Fleeing or at risk of domestic violence;
 - No-fault eviction, condemnation, or foreclosure; or
 - The family's children are exposed to a substantial health or safety risk; and
- The family has no feasible, alternative housing available to them.

EOHLC requires families to submit the following types of documents in order to verify identity and the relationship between applicant family members, and to verify statements families make in applying for the EA Family Shelter program. Required documents include:

- Proof of identity;
- Proof of familial relationship (or pregnancy, as applicable);
- Massachusetts residency;

- Citizenship or Immigration documents;
- Documents supporting the cause of homelessness; and
- Financial information on assets and income.

In addition to the eligibility requirements, as referenced above, since January 2025, EOHLC has required a CORI check for all applicants for the EA Family Shelter program aged 18 or older, as well as for all individuals 18 years of age or older participating in the program.

Impact of Existing Requirements

Historically, applications to the EA Family Shelter program were primarily completed in person in one of ten (10) area offices located throughout Massachusetts, except in limited circumstances, for those at imminent risk of domestic violence, which were often conducted over the telephone. For several families, including those without reliable transportation, those in rural areas, and those with family members with disabilities or complex medical conditions, the requirement to apply for the program in person was a barrier.

During the COVID-19 pandemic, EOHLC (then as DHCD) expanded the use of the existing telephone services and began to allow for a larger portion of the application process to be conducted virtually.

In December 2024, EOHLC launched an online portal, Housing Help Hub, that allows families to apply for EA Family Shelter online, either on their own or with the assistance of a delegated advocate. Access to the online portal is available 24 hours a day, 7 days a week, and does not require travel or waiting in line to seek support. Using the tool, families can upload documents for verification that they would otherwise have needed to bring to an office to be reviewed and scanned. Families can still apply in person, but most apply virtually, which allows for quicker determination of eligibility.

Beginning in January 2025, pursuant to the CORI policy and statutory requirements under M.G.L. Ch. 23B, § 30(C1½), EOHLC introduced a mandatory in-person component of the application process, which brought at least adult members of all families back into the area offices, including those who applied online. To complete the required CORI check, an adult applicant aged 18 or older must complete the following steps in person at an area office¹³:

1. Each adult family member must verify their identity by presenting a valid photo ID¹⁴ or another approved document or set of documents to an EOHLC employee for review;

¹³ EOHLC pays for the cost of travel to and from the EOHLC Field Office.

¹⁴ Acceptable forms of identification are defined by DCJIS, 803 CMR 2.11, and the *Criminal Offender Record Information Policy for the Emergency Assistance Family Shelter Program*: <https://www.mass.gov/doc/ea-cori-policy-1/download> (April 11, 2025).

2. After the identity of the adult family member has been verified, they must then sign a CORI Acknowledgement Form, authorizing EOHLC to conduct a CORI check against the information they provided verified by their documentation.

Only after these two in-person steps are completed can EOHLC conduct a CORI check.¹⁵ EOHLC cannot determine whether a family is eligible for the program or place a family in shelter until all eligibility criteria are met, including the completion of the CORI check.¹⁶ Once a family is in shelter, their length of stay is six months for the Bridge Shelter Track and 30 business days for the Rapid Shelter Track, absent specific waivers or extensions.¹⁷

Operational and Fiscal Impacts of Implementation

Based on how other state agencies have implemented nationwide background checks and assumptions about the number of individuals accessing EA Family Shelter who would require NCIC background checks, EOHLC analyzed the operational and fiscal impacts of implementation. As set forth below, implementation would require approximately **\$430k-\$765k** in startup costs and **\$2.6M-\$4.1M** in annual operating costs and involve certain operational impacts to the eligibility process.

Two Potential Options for Implementation

Based on fact-finding conducted with other state agencies, it appears that EOHLC would have two distinct options for how to implement background checks for applicants 18 years of age or older through the NCIC for the EA Family Shelter program.

1. **EOHLC Directly Manages the Process.** EOHLC would need to purchase fingerprint scanning equipment, develop appropriate protocols, hire additional staff, train staff to implement those protocols, and submit fingerprints directly.
2. **EOHLC Engages a Third-Party Vendor to Complete the Process.** EOHLC would need to procure and contract with a suitable third-party vendor on statewide contract, such as Idemia, the vendor currently under contract for similar work with other state agencies. EOHLC would need to instruct families how to schedule appointments and coordinate transportation for adults in applicant families to and from the background check locations, and this would require additional staff. EOHLC would also need to develop appropriate protocols and train staff to implement those protocols correctly.

¹⁵ Alternatively, families can pay to have their form notarized. A small number of families elect to do so and then transmit or hand-deliver the notarized form(s) to the EOHLC area office.

¹⁶ 760 CMR 67.06(1)(c) defines several narrow exceptions.

¹⁷ In February 2025, the Legislature established a 6-month time limit on a family's eligibility for EA Family Shelter, amending the prior 9-month limit. Section 3 of Chapter 1 of the Acts of 2025 amended M. G.L. Ch. 23B, § 30, which is the statute governing the EA program.

Both options would entail one-time and ongoing expenses as further detailed below.

Operational Impacts

Over the course of 2024, EOHLC served over 10,000 families and an estimate of approximately 20,000 total adults over 18 in EA family shelter. This amounted to an average of more than 40 families, or 80 individuals, per business day. In 2025, EOHLC data suggests an average of 30 individuals requiring CORI checks per business day, which is another indication of the number of NCIC background checks that would be needed.

Averaging this data indicates that—if nationwide background checks were in place—EOHLC could need to provide fingerprint services to an average of 55 individual adults per day. As demand for the EA Family Shelter program fluctuates week to week and day to day with some considerable variance, the operation of NCIC would need to service peak demand for background checks at higher levels.

To pursue the implementation of nationwide background checks for adult applicants to the EA Family Shelter program, it will be necessary to select from the two options the path that introduces the fewest operational impediments and the lowest cost, while mitigating additional delays to families' ability to access emergency shelter.

Regardless of the implementation option selected, the process for completing fingerprint analysis can be time-consuming. Based on fact-gathering research with other Massachusetts state agencies, EOHLC has learned that when working with a third-party vendor, it can often take constituents more than 24 hours before they can successfully schedule an appointment to complete the identity verification and fingerprinting processes needed for national background checks. After the fingerprinting is complete, whether a third-party vendor was used or not, the prints are electronically transmitted to the Massachusetts State Police and the FBI to be processed. The results of the search are subsequently returned electronically to EOPSS/DCJIS' system, Statewide Automated Fingerprint Information System (SAFIS), before being made available to the government agency making the request. **This multi-step process takes between 5 to 21 business days to complete.**

Families eligible for EA Family Shelter without prioritized risk factors are typically assigned to the Rapid Shelter Track, which has a length of stay durational limit of 30 business days. If EOHLC were to implement NCIC checks and require such checks as a condition to entry, some families might have to wait nearly as long to complete the background check process, including time to schedule and wait for an appointment, as the total number of days that they would receive the shelter benefit itself.

Staffing Requirements

Under either option, EOHLC would need a dedicated team to process the results of the background checks of applicants and make decisions about eligibility based on the results. Other state agencies that implement background checks have dedicated teams to manage the processing of both CORIs and background checks. EEC has a team of 36 staff to manage an annual application caseload of 85,000, which is a staff to applicant ratio of 1:2,361.

Applying the same logic to an EOHLC CORI and background check team, EOHLC's Division of Housing Stabilization would require 6 staff fully dedicated to this effort, to review and process the results of background checks. We estimate this new cost to be **\$525,000 to \$636,000** per year.

EOHLC would require additional staff to input data from SAFIS without an additional secure data platform to receive the NCIC background check data from SAFIS and transmit the determinations to Housing Help Hub, the EOHLC Salesforce platform that manages applications. DCF has hired analysts to manually review and input the data from SAFIS into their existing database and have 20 analysts for an annual caseload of 10,000 applications, for a staff ratio of one analyst per 500 applications. These staff analyze the results of background checks, in addition to several other safety checks. If EOHLC pursues this option for the estimated 13,750-individual volume of background checks annually, this would require an estimated 14 staff to review and input data from background check results (at a ratio of 1:1,000 applications), instead of 6 staff. We estimate this would cost **\$1.2M-\$1.5M** per year in staffing costs instead of \$525k-\$636k.

Transportation Requirements

A significant number of families applying to the EA Family Shelter program do not have their own means of transportation. EOHLC provides support and funding for transportation to EOHLC offices for families who do not have other options and would need to do so for families to complete nationwide background check authorizations and fingerprinting.

If EOHLC engages a third-party vendor to complete the process, EOHLC could need to arrange and pay for transportation to and from the vendor location¹⁸ to complete the necessary authorizations and fingerprinting. Assuming 28 families, or 55 individuals require background checks each day, that would assume at least 28 round-trip rides per day to and from the vendor locations. Some families have their own vehicles or may access public transportation, which would reduce the number of rides required, while some families may not be able to coordinate the adults in their family going to the vendor location at the same time due to timing conflicts such as work, childcare, or school pick-up/drop-off. For this

¹⁸ A review of the IdentiGo by Idemia website demonstrates that most sites are not well-served by frequent public transportation, even for the Greater Boston locations.

option, we estimate that EOHLC would need to coordinate an average of 34 round-trip rides per day at an average rate of \$110 per round-trip ride for an average cost of \$3,781 per day or **\$945,313** per year. We estimate requiring an additional two full-time field staff to coordinate appointments and transportation, requiring an additional **\$175,000-\$200,000** in annual staffing costs.

If EOHLC directly manages the process, EOHLC would not need to coordinate transportation to a third-party vendor but would still need to expend additional funds to provide more rides for applicants. Currently, adults aged 18 and older in applicant families need to present themselves in person to verify their identity and consent to a CORI check. EOHLC currently organizes an average of two trips per business day to field offices for families who do not have their own transportation. Assuming EOHLC would need to organize and cover costs of a similar number of families per day to get an NCIC check at an EOHLC office, and assuming an average rate of \$110 per round-trip ride, EOHLC would incur additional costs of \$220 per day, or **\$55,000** per year.

Technology Requirements

Regardless of the proposed implementation option, EOHLC would need to invest in technology to operate NCIC checks. Whether fingerprinting is conducted in-house or by a third-party vendor, data from the background check would still come in through DCJIS, and EOHLC would require technology to connect application information from EOHLC's Housing Help Hub system to the data DCJIS receives from the background check. EEC uses a platform called the Background Clearinghouse Enterprise Exchange (BigChex) and a secure in-house data platform system called Viewer to make and integrate determinations from the background check. DCF, rather, employs 20 analysts (1 analyst per 500 checks) to manually check the data in the SAFIS and input it into DCF data systems.

If EOHLC directly manages the process, the agency would need to purchase and maintain fingerprint scanners of at least one per area office (minimum of 10, one for each area office), as well as the software and licenses required to check the data against the national databases. Demand for EA Family Shelter is not equally distributed among EOHLC's area offices, and additional scanners may be required, either to account for increased demand or as reserve devices to ensure continuity of operations should any scanners fail during the course of normal business. EOHLC would need to plan for annual recurring equipment maintenance costs, as the equipment ages and needs fixing or replacement. This annual maintenance cost, assuming replacement of one or two machines, is estimated at **\$10,000-\$20,000**. In addition, the agency would need to pay one-time and ongoing costs for necessary data integration between the devices and systems required to engage the NCIC check process and EOHLC's existing systems of record.

The agency would also need to hire additional staff to run this process at field offices and make start-up investments in training to prepare staff. This additional staffing costs approximately **\$875,000 per year**.

If EOHLC engages a third-party vendor to complete the process, the agency would need to invest in the appropriate system integration solutions required to ingest the background check data from the third-party vendor into EOHLC's existing systems of record.

BigChex was built for the Commonwealth of Massachusetts as part of a broader background record check project funded by the Executive Office of Technology Services and Security (EOTSS). The BigChex application is available to any agency, not just EEC, for its Navigator solution. BigChex connects to DCJIS through an application programming interface (API). Using the example of EEC, their Navigator program sends its request to BigChex which then routes the information to DCJIS. On the return trip, DCJIS sends data to BigChex and BigChex routes the information back to EEC's Navigator, which then further pushes the information to EEC's Viewer system.

If EOHLC sought to build a background record check technological process, it may be feasible to use the BigChex solution and leverage the existing API connection between BigChex and DCJIS. Some adjustment might be required to differentiate or account for the different sources of the information. To use BigChex, EOHLC would incur some minimal costs to help cover the program's API infrastructure. EOHLC would need to build its own secure data platform to receive the background check results from BigChex, review these results, and make determinations. These determinations would then integrate into EOHLC's existing Housing Help Hub platform, which manages application review and decisions. While the precise cost has not yet been established, such reconfiguration and software build is estimated to come at a cost.

Regardless of which path is pursued, EOHLC would need to make additional investments in technology to implement nationwide background checks. EOHLC anticipates the need to integrate new software with the existing applicant management system, Housing Help Hub, which is built on a Salesforce platform, and the need to build additional data fields and workflows required to ingest and action decisions based on additional nationwide criminal background check information. This would require one to two months of development and testing on the part of the agency's Salesforce implementer, which would be estimated at **\$82,500** for a one-month build cycle. Utilizing one to two months of development would also delay other technological improvements that are critical for the EA system.¹⁹ If integrating NCIC data into the Housing Help Hub solution ultimately requires additional or different visibility restrictions than those already in place, that could warrant the expenditure of significantly more time and money to further reconfigure the existing system, thereby delaying other planned and important improvements to the platform. In addition to one-time development costs, ongoing expenses are anticipated, specifically for data use and data integration.

¹⁹ Housing Help Hub rollout began in November 2024 and continues to date. EOHLC is presently transitioning from Phase 1 to Phase 2. The rollout is anticipated to continue through the next fiscal year.

Cost Projections

There is an individual fee for each NCIC Check conducted, ranging from **\$35 to \$55** per applicant. The exact fee would be set in the enabling statute but could not be waived in full as they are essential to the operation of the system. EOHLC could sign an ISA with the EOPSS to cover these fees for individuals applying to EA shelter. The fees are divided as follows:

1. FBI fee to process the background check;
2. Fee collected by the vendor to facilitate the collection and submission of the background checks; and
3. Payment to the Commonwealth to maintain and support the system.

With the assumptions about annual application numbers and individual fees, the individual fees would incur an annual cost of **\$481,250-\$756,250**.

Based on the assumptions about number of adults requiring a background check and unit costs for operational needs outlined in the sections above, EOHLC has calculated a range of estimated ongoing costs for the two options explored: using a third-party vendor for fingerprinting or developing in-house capabilities. For option one, using a third-party vendor, annual recurring costs are estimated to be **\$2.63M-\$3.36M**. For option two, EOHLC staff directly managing the check, annual recurring costs are estimated to be **\$2.45M-\$3.29M**.

Table 1: Estimated Recurring Expenditures by Option

Ongoing Costs	Estimated Recurring Expenditures	
	Option 1: Third-party vendor	Option 2: Managed directly by EOHLC staff
Staffing	<p>\$525,000-\$636,000 (6 full-time employees to process the results of background checks)</p> <p>\$175,000-\$200,000 (Additional EOHLC staffing costs (2 full-time employees) to coordinate appointments and transport)</p>	<p>\$525,000-\$636,000 (6 full-time employees to process the results of background checks)</p> <p>\$875,000-\$1M (additional annual staffing costs (10 full-time employees) to conduct fingerprinting if EOHLC directly manages the process)</p>

Transportation	\$945,313 (~53 round trip rides/day ~250 work days/yr * est. cost/ride (\$110))	\$55,000 (~2 round trip rides/day into field offices) ~250 work days/yr * est. cost/ride (\$110)
Technology or additional staff to integrate background check data	\$500,000-\$821,500 (Annual cost of tech integration or additional 8 data staff)	\$500,000-\$821,500 (Annual cost of tech integration or additional 8 data staff)
Background Check Expenses	\$481,250-\$756,250 (\$35-\$55 per applicant, 13,750 applicants)	\$481,250-\$756,250 (\$35-\$55 per applicant, 13,750 applicants)
Total	\$2.63M-\$3.36M	\$2.45M-\$3.29M

We project one-time start-up costs of **\$432,500-\$565,000** to implement option one, engaging a third-party vendor to conduct fingerprinting for background checks. We project start-up costs of **\$632,500-\$765,000** to implement option two, the development of in-house capabilities for fingerprinting and background checks. A full breakdown of one-time start-up costs are in the table below.

Table 2: Estimated Start-Up Costs by Option

Start-Up Cost Categories	Estimated Start-Up Costs	
	Option 1: Third-party vendor	Option 2: Managed directly by EOHLC staff
Staffing	\$350,000-\$400,000 (.5 year of staff time – 4-5 full-time employees - to operationalize and train)	\$450,000-\$500,000 (.5 year of staff time – 6-7 full-time employees - to operationalize and train)
Equipment	N/A	\$100,000 (Purchase and installation of fingerprinting machines at field offices)
Technology	\$82,500-\$165,000 (technology integration into existing application platform)	\$82,500-\$165,000 (technology integration into existing application platform)
Total	\$432,500-\$565,000	\$632,500-\$765,000

Conclusion

Conducting proper eligibility determination and background checks is an important element of operating a safe and operationally and fiscally sustainable EA Family Shelter program. Implementing nationwide background checks for those in the EA Family Shelter program would first require new state legislation and then federal approval by the FBI. Projected costs for implementation range from **\$430k-\$765k** in startup costs and **\$2.45M-\$3.36M** in annual operating costs. As noted above, the FBI may take 5 to 21 business days to process and return results for a nationwide background check, which could increase wait times for placement into shelter for some families as compared to current baselines.