



**SPAN**

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**The Honorable Cindy F. Friedman, Chair**

Massachusetts State Senate Committee on Health Care Financing  
24 Beacon Street, Room 313-B  
Boston, MA 02133

**Position Letter: S.884 (An Act to Create Affordable Homes for Persons with Disabilities) – Support if Amended**

**Dear Chairwoman Friedman and Members of the Massachusetts Senate Committee on Health Care Financing,**

Students for Patient Advocacy Nationwide (SPAN) supports the intent of S.884, which seeks to expand access to affordable housing for individuals with disabilities across the Commonwealth. We applaud the Legislature's efforts to address long-standing disparities in accessible housing supply and recognize the urgency of this initiative to promote dignity, independence, and community inclusion for people with disabilities. However, after careful review of the bill's language, we respectfully request a focused amendment to close a critical implementation gap that could limit its real-world impact.

Specifically, S.884 aims to create housing that is accessible to people with disabilities, but the bill does not define or require compliance with any nationally recognized accessibility standards such as ANSI A117.1 or the Uniform Federal Accessibility Standards (UFAS). Without such a mandate, there is no assurance that housing units constructed or renovated under this law will meet even minimum accessibility thresholds. This omission creates a significant loophole - developers may self-certify units as "accessible" based on minimal or inconsistent internal standards, resulting in housing that technically complies on paper but is not practically usable for residents who use mobility devices, have sensory disabilities, or require specific spatial configurations.

This is not a theoretical concern. A 2024 report by the Massachusetts Statewide Independent Living Council (MASILC), titled "A Crisis Within a Crisis: Stories of the Accessible Affordable Housing Shortage in Massachusetts," found widespread discrepancies between units labeled as "accessible" and their actual usability by residents with disabilities. Many reported units lacked basic features such as adequate door widths, barrier-free showers, or reachable appliances. The study also revealed that developers frequently self-designated units as "accessible" without meeting formal standards, leaving

residents to navigate dangerous or unusable environments. These findings reflect an urgent and systemic issue that will persist unless addressed legislatively.

To address this concern, we provide the following Amendment Proposal:

**Amend Section 1 of S.884** to include the following provision:

“All housing units constructed, renovated, or funded pursuant to this act shall meet the requirements of either the 2017 edition of ANSI A117.1 or the Uniform Federal Accessibility Standards. Compliance shall be verified by a qualified third-party accessibility reviewer prior to issuance of a certificate of occupancy.”

This amendment would ensure consistency, enforceability, and genuine accessibility for housing developed under S.884, without requiring the creation of a new regulatory framework or imposing significant additional costs. By aligning with national standards already used in housing projects across other states, Massachusetts can ensure the integrity of this initiative and fulfill its promise to people with disabilities.

SPAN is proud to Support S.884 If Amended to include this clarification. We respectfully urge the committee to adopt this amendment to strengthen the bill’s enforceability and ensure it delivers on its equity and accessibility goals. We are available to provide further data, testimony, or technical input upon request.

Sincerely,



**Vishank Panchbhavi**  
**Collegiate Ambassador, SPAN**



**Joel Blessan**  
**Policy research Director, SPAN**



**Shayan Saqib**  
**HS Ambassador, SPAN**