



MINNEAPOLIS

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MN Department of Human Services
Public Comment State Plan Amendment
25-21: Terminating Housing Stabilization Service

Submitted via email to dhs.spa.comments@state.mn.us

To Whom It May Concern:

Mid-Minnesota Legal Aid (MMLA) submits this comment regarding MN DHS State Plan Draft Amendment 25-21 which will terminate the Housing Stabilization Services (HSS) program through the 1915(i) State Plan Home and Community-Based Services (HCBS). The HSS program's stated goals are to support housing stability for people with disabilities who are homeless or at risk of becoming homeless by providing assistance to find, obtain, and maintain stable tenancies. These are laudable goals for which there is clear need – if the goals are met, the services could make profound improvements in the lives of the people HSS is designed to serve. But HSS has failed. MN DHS gave public notice on August 1, 2025 of its intent to terminate the HSS and solicited public comments on its actions.

MMLA is a nonprofit organization providing civil legal representation to people with low incomes in twenty central Minnesota counties, from the City of Minneapolis to farm country. The 14,674 square mile area stretches across Minnesota from east to west. According to the 2022 American Community Survey ("ACS"), there are 190,508 people living below the poverty line in the MMLA service area. MMLA's mission is to advocate for the legal right of disadvantaged people to lead safe, healthy, and independent lives in their communities. In 2023, MMLA provided representation and advice to 8,501 low-income households and reached tens of thousands more through its online legal information services. Housing cases were 20.4% of MMLA's 8,501 cases in 2023.

Additionally, since 1995 our Housing Discrimination Law Project (HDLP) has addressed issues of housing discrimination in our service area working jointly with St. Paul's legal aid organization, Southern MN Legal Services' Housing Equality Law Project (HELP). HDLP and HELP represent clients facing housing discrimination throughout the 12-county Twin Cities metro area. HDLP sees housing discrimination in every sort of residential housing from Minneapolis' urban core, out through suburban and exurban communities to rural areas. Over

the years, one issue in our clients' lives has remained constant: barriers to finding and keeping housing, or moving to housing opportunity, because of housing discrimination.

I am an attorney in the MMLA housing unit working in Minneapolis and the surrounding Hennepin County. Our work encompasses the full range of legal advocacy on behalf of our clients, working to: help them avoid homelessness; ensure the housing stock includes housing affordable to those with the lowest incomes; ensure that their housing is well maintained; and ensure stability of their tenancies so that they, their children, and their communities thrive. There is a shortage of affordable and available rental units within Minnesota and within the Minneapolis Metropolitan area. For every 100 households at or below HUD's extremely low income level there are only 39 available units in Minnesota and only 34 available units in the Minneapolis metropolitan area.¹

We cannot afford to continue the HSS program in its current form but we cannot ignore the HSS goals that will help overcome the systemic housing barriers that prevent the reintegration of many people with disabilities who are homeless or at risk of homelessness, and who need assistance to find and keep stable housing so our family members, friends, and colleagues can become contributing and valued members of our communities. A redesigned and effective HSS program must recognize and support the value of these adversely affected members of our communities who need the assistance that HSS could provide to be part of our civic life.

On behalf of our clients we strongly urge for better planning than what has occurred publicly thus far in response to the clients/enrollees in the HSS program when payments and services stop. Some people are receiving services from HSS providers, and while those services would be improved by redesigning services and oversight of delivery by providers, the termination of HSS announced by DHS provides extremely vague assurances that services will be available to people who need support to find housing or maintain their tenancies. The FAQs on the DHS site, <https://mn.gov/dhs/housing-stabilization-services-termination/>, must actually answer questions posed and not just offer vague possible resources through broadly described county or tribal authorities to find out what services might be available to them with HSS terminated. Many of the people seeking or receiving HSS services to find or keep housing and avoid homelessness categorically need support and assistance to contact their county or tribal resources for help.

MN DHS has indicated in its FAQs and other public statements that it is considering a redesign to meet the goals and needs that HSS identified but failed to meet. On behalf of our clients we strongly urge that the redesign efforts be carried out quickly and with involvement of more stakeholders than DHS staff, legislative staff, and any providers who remain after the prosecution has concluded. The program must exist with recognition and information about the needs of clients/enrollees who are the people with disabilities who are or have been homeless. The value

¹ "Gap Report: Minnesota", National Low Income Housing Coalition, Accessed September 17, 2025, <https://nlihc.org/gap/state/mn>.

of lived experience to identify needs and solutions to problems must be part of the redesign or any program that is created to meet the goals of the terminated HSS program.

Thank you for the opportunity to provide input on this process that is so important to our community. Our suggestions based on our experience and the experiences of our clients can inform the process of redesigning an HSS Program that will achieve the goals of supporting members of our community at critical points in their housing search and result in a program that is functional, accountable, and effective for our entire community. If properly revised and administered, a program with the goals of HSS can address the needs of enrollees who need those critical supports and services in a way that is effective and accountable public policy to achieve the public good.

Sincerely,

/s/ Dorinda L. Wider

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