



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

December 9, 2010

Mr. Raphael Bostic
Assistant Secretary for Policy Development and Research
U.S. Department of Housing and Urban Development
451 7th Street, SW
Washington, D.C 20005

Dear Assistant Secretary Bostic,

As we discussed in our July meeting, the Consortium for Citizens with Disabilities Housing Task Force (CCD) has determined that recent U.S. Department of Housing and Urban Development (HUD) worst case housing needs reports to Congress based on the American Housing Survey (AHS) significantly undercount the incidence of worst case needs among non-elderly households with disabilities. This assessment is based on estimates prepared by Kathryn P. Nelson, Ph.D with the assistance of Danilo Pelletiere, Ph.D., Research Director of the National Low Income Housing Coalition. Their research was coordinated by the Technical Assistance Collaborative (TAC), a national non-profit organization funded by the Melville Charitable Trust.

This letter transmits the results of the most recent CCD study by Dr. Nelson and Dr. Pelletiere using the best data sources now available, including the 2007 American Community Survey, the National Health Interview Survey and the Survey of Income and Program Participation. As found for 2005 in their earlier study, *The Hidden Housing Crisis: Worst Case Housing Needs Among Adults with Disabilities*, worst case needs among non-elderly adults with disabilities in 2007 could be more than double HUD AHS-based estimates.

Specifically, the new estimates indicate that as many as 2.1 to 2.4 million non-elderly very low income adult renters with disabilities probably had worst case needs in 2007, more than double HUD's published estimate of 1 million households. These levels of need are quite similar to the previous CCD study conducted by Nelson in 2008.

Consistent with the discussion in our meeting, the attached results are ready to be posted on HUD's website so that the public can be informed regarding the extent of the housing problems experienced by very low income non-elderly individual and family renters with disabilities. Dr. Nelson and Dr. Pelletiere are available to review and discuss the study's findings at your earliest convenience.

We also discussed the fact that both HUD and CCD estimates come from surveys of renter households, and therefore exclude important data on homeless adults with disabilities as well as people with disabilities living in group quarters and institutions. These housing issues are the focus of activities emerging from HUD's new partnership with the U.S. Department of Health and Human Services and also have relevance for U.S. Department of Justice activities related to the U.S. Supreme Court's *Olmstead* decision and state violations of the Americans with Disabilities Act. We look forward to working with you to improve housing needs estimates for these vulnerable people.

Finally, the CCD understands that a U.S. Census advisory panel recently made recommendations regarding disability-related questions to be used in future federally funded surveys, including the 2009 AHS. We recently consulted with Dr. Andrew Houtenville – Associate Professor of Economics and Research Director of the Institute on Disability at the University of New Hampshire – who is concerned that the panel's recommendations may make it more difficult to assess the full extent of housing needs among non-elderly people with disabilities with very low incomes. He plans to analyze the effect of their recommendations more thoroughly when new SIPP data become available in early 2011. Dr. Nelson and Dr. Pelletiere are also continuing to study these issues and will be presenting a paper at PD&R's AHS conference next March.

The CCD Housing and TAC look forward to continuing our collaboration with PD&R to improve housing needs estimates related to very low income people with disabilities. One possible next step would be to schedule a meeting on these issues in early 2011 that would include Dr. Houtenville, Dr. Nelson and Dr. Pelletiere. Please feel free to contact Andrew Sperling at 703-516-7222 if you have any questions or would like to follow up on the matters covered in this letter.

Sincerely,

Andrew Sperling, Co-Chair, CCD Housing Task Force (NAMI)

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