



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

July 12, 2010

Mr. Robert C. McFetridge
Director, Regulations Management (02REG)
Department of Veterans Affairs
810 Vermont Avenue, NW, Room 1068
Washington, DC 20420

Re: RIN 2900–AN41 Hospital and Outpatient Care for Veterans Released from Incarceration to Transitional Housing

Dear Mr. McFetridge:

We the undersigned members of the Consortium for Citizens with Disabilities (CCD) Veterans Task Force are writing to provide comment on the proposed rule announced by the Department of Veterans Affairs (VA) that would allow the VA to provide hospital and outpatient care to veterans who have been released from incarceration to transitional housing. The notice was officially published for comment on May 12, 2010.

CCD is a coalition of national consumer, service provider, and professional organizations which advocates on behalf of people with disabilities and chronic conditions and their families.

We support the adoption of the proposed rule which amends the regulations to allow the VA to provide hospital and outpatient care to veterans in transitional housing programs (such as community residential re-entry centers or halfway houses) upon release from incarceration. The proposed rule change will allow the VA to provide support to veterans who have been incarcerated in a prison or a jail as they seek to reintegrate into society. Ensuring that these veterans who are among the most vulnerable are able to receive hospital and outpatient care from the VA will help to prevent homelessness and other consequences that may result if eligible veterans are later unable to connect with VA medical services.

Although the proposed rule authorizes the VA to provide outpatient care to this population, it does not define the outpatient services it will provide. We recommend that the VA include peer services, ACT teams, and mobile crisis teams in the medical benefits package, and ensure that the services are voluntary and flexible. We also recommend that the services be consumer-directed and designed to help veterans achieve their individually identified goals.

While providing medical care is an important first step in helping veterans successfully reintegrate into their communities, we also urge the VA to use its influence to fully implement the Housing First model and secure scattered site permanent supportive housing for these individuals. As the VA moves toward implementing Housing First, to the extent that it continues to use transitional housing, we urge the VA to provide scattered site permanent supportive housing to individuals upon completion of transitional housing programs. Robust supportive housing, along with job training and other supports, can help veterans with disabilities who were formerly incarcerated to receive the services needed to help them avoid incarceration in the future. Only by providing a continuum of voluntary targeted services will the VA be able to adequately address the needs of these veterans.

Thank you for the opportunity to comment on the proposed rule. CCD and its Veterans Task Force stand ready to assist the VA in any way to serve veterans with disabilities.

Sincerely,

American Dance Therapy Association
Bazelon Center for Mental Health Law
National Council on Independent Living
National Disability Rights Network
National Spinal Cord Injury Association
Paralyzed Veterans of America
United Spinal Association
VetsFirst
Vietnam Veterans of America