



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

Via Facsimile

December 7, 2005

The Honorable Alphonso Jackson
Secretary
U.S. Department of Housing and Urban Development
451 7th Street, S.W., #10000
Washington, DC 20410

Dear Secretary Jackson:

The Consortium for Citizens with Disabilities (CCD) Housing Task Force would like to go on record in opposition to provisions in HUD's November 2, 2005 Notice of Funding Availability (NOFA) for the Section 811 Mainstream Housing Opportunities for Persons with Disabilities program (Mainstream program).

CCD is extremely concerned that publication of this NOFA represents a continuation of ill-advised and poorly administered HUD policies that are re-directing scarce Section 811 funds away from desperately needed new supportive housing for people with the most severe disabilities. This shift represents a continued diversion of limited resources away from non-elderly people with severe disabilities who cannot successfully obtain housing that meets their needs in the community using vouchers. Moreover, the lack of appropriate HUD guidance and tracking for Section 811 Mainstream vouchers has resulted in these vouchers being underutilized and being given to non-disabled households – a clear violation of the Section 811 statute. CCD and Members of Congress with a strong interest in the program have made HUD staff aware of these issues For many years.

In our view, FY 2005 HUD appropriations language did NOT require HUD to use the limited 811 funds for new Mainstream vouchers. Based on our reading, HUD could have easily directed these funds to expanding the number of units funded under the capital advance component of Section 811. Instead, HUD chose to issue a NOFA for as few as 250 vouchers and to permit public housing authorities (PHAs) to apply despite the well-documented problems with PHA administration of the Mainstream program.

CCD is extremely concerned about specific provisions in the NOFA that deviate substantially from the statutory purpose of the Section 811 program. Of particular note is the provision that PHAs can receive the maximum number of points in the competition if they provide or arrange for services for only 80 percent of Mainstream program participants. The Section 811 statute is clear that grantees must offer supportive services to all Section 811 participants.

CCD continues to oppose HUD's existing policy -- continued in this NOFA -- of distributing 811 funds to PHAs. In particular, we object to awarding 811 funding to PHAs with designated public housing allocation plans. These PHAs are the least likely to have any understanding of the critical housing issues facing people with disabilities with the lowest incomes in every community in our country today. In fact, we believe that this HUD policy could create an incentive for PHAs to continue to reduce the supply of public housing available for non-elderly people with disabilities at a time when Section 8 voucher funding is also increasingly scarce. We are also concerned about the waiting list for unfunded Mainstream applications that theoretically would get funded first in FY 2006. This provision of the NOFA sent a clear message regarding future policy which – at the time of publication – had yet to be decided by Congress.

The CCD Housing Task Force worked through out 2005 to defeat the Administration's ill-advised FY 2006 budget proposal to end the development of housing with Section 811 funds. We continue to oppose the Administration's position that the Section 811 program is not needed to create decent, safe and affordable supportive housing for people with the most severe disabilities. In our view, there is overwhelming evidence that the supportive housing needs of non-elderly people with severe disabilities continues to grow as states and communities continue to rely on nursing homes, institutional settings, unlicensed board and care homes, and the homes of aging parents in their 70s and 80s, simply because there is no supportive housing available.

CCD urges HUD to consider pulling this NOFA back and reallocating funding to the FY 2005 round of funding for the capital advance/project-based side of the Section 811 program. At a minimum, the deficiencies in the 811 mainstream program need to be addressed before additional funds are invested in the program.

Thank you for your attention in this important matter.

Sincerely,

CCD Housing Task Force Co-Chairs:

Kathy McGinley
NDRN

Liz Savage
The Arc-UCP

Andrew Sperling
NAMI

cc: Hon. Christopher S. Bond
Hon. Patty Murray
Hon. Joe Knollenberg
Hon. John W. Oliver
Assistant Secretary Orlando J. Cabrera

The CCD Housing Task Force is a coalition of national disability organizations representing people with disabilities, their families, providers and professionals. Among the organizations participating the in the CCD Housing Task Force are The Arc-United Cerebral Palsy Disability Policy Collaboration, the National Alliance on Mental Illness, Easter Seals, Paralyzed Veterans of America, American Association on Mental Retardation, National Disability Rights Network, National Mental Health Association and the Brain Injury Association if America.