



September 11, 2017

Office of Rural Housing and Economic Development
U.S. Department of Housing and Urban Development,
451 Seventh St. SW.,
Room 7240,
Washington, DC 20410.

On behalf of the Consortium for Citizens with Disabilities Veterans Task Force, the following comments are submitted in response to the advance Notice of Funding Availability for the Disabled and Low-Income Veterans Housing Program which was authorized by the National Defense Authorization Act for Fiscal Year 2015. CCD is a national coalition of more than 100 disability rights, advocacy, consumer and provider organizations. The CCD Veterans Task Force concerns itself with issues affecting veterans with disabilities as people with disabilities and was a strong supporter of the legislation which undergirds this program. Our comments are presented below each of the questions posed in the original notice.

A. Criteria for Veterans

What considerations should HUD make in determining veteran eligibility?

The task force recommends that HUD use receipt of SSDI and/or SSI as eligibility criteria for the program. HUD should also consider veterans who are eligible for health care through the Veterans Health Administration due to designation as a catastrophically disabled veteran under Priority Group 4.

Should HUD limit eligibility to veterans who have a disability and are low-income in order to provide the most benefit to veterans with the limited funding available under the program?

Yes, given the purpose of the program this would be an appropriate limitation. HUD may wish to examine the merits of defining "low income" according to HUD criteria [e.g. very low income defined as 20% area median income by HUD] versus VA income thresholds to determine which would help the greatest number of veterans in need.

B. Criteria for Grantees

What criteria should be used to evaluate an eligible organization's capacity? Should HUD consider the organization size? Should HUD consider the regions the organizations serve? Should HUD consider how long the organization has existed?

The task force suggests that HUD focus its attention on those regions of the country where there are large concentrations of low income veterans with disabilities. HUD should seek organizations that have a proven track record in housing adaptations and modifications. Prospective grantees with past

experience in serving low income veterans with disabilities, including private non-profit direct service disability and veterans organizations, should receive priority consideration.

Should HUD consider the capacity of the organization to provide housing rehabilitation and modification and the organization's past performance? If so, how should HUD measure capacity and past performance?

Prospective grantees should demonstrate and document an extended period of success in housing rehabilitation and modification using metrics such as numbers of units rehabilitated and/or modified and cost per unit. HUD should also consider any partnerships the organization has with the veterans community.

Should HUD provide a preference for qualified nationwide or statewide organizations that serve veterans, low income individuals, or both?

Again, the task force believes that preference should be given to those organizations with a record in serving veterans with low incomes as well as a history of partnering with veterans organizations. However, such a preference should not be used against otherwise highly qualified organizations.

Are there thresholds that HUD should use to ensure that the organization primarily serves disabled and low income veterans?

The organization should have a record in serving veterans but need not serve primarily low income disabled veterans.

C. Use of Funds

Given the limited funding, how should HUD structure the program or NOFA to minimize duplication or overlap and maximize coordination with other existing programs for veterans?

HUD should ensure that organizations have good processes for evaluating potential projects so that underserved veterans are given preference in housing adaptations.

Given the limited funding for the program, should HUD structure the program to take into account the severity of eligible veteran's disability-related need for a modification or rehabilitation of the home? If so, how?

HUD should focus on veterans with certain types of disabilities most in need of the type of housing this program is intended to provide – e.g. SCI, blindness, burns, amputations. If an organization does outreach to veterans with service connected disabilities, such efforts should be directed to those veterans with lesser service-connected ratings coupled with non-service-connected disabilities.

Should HUD aim to fund more extensive housing modification and rehabilitation services, which may serve fewer disabled and low-income veterans, or less extensive housing modification and rehabilitation services, which may reach a larger number of disabled and low-income veterans?

HUD should seek to fund home modifications and rehabilitations that focus on egress, access to restrooms facilities and other health/safety concerns.

What considerations should HUD take into account to ensure that property rehabilitation costs are not unreasonably high?

HUD could limit the amount of funding that can be spent on any given project.

Are there rehabilitation services that HUD should consider an eligible use of funds beyond those listed in section 1079(b)(3) of the Program Statute?

HUD may want to consider giving organizations the opportunity to provide additional services beyond those listed if they are related to the listed services and are needed to ensure the health or safety of a veteran recipient.

In determining whether the veteran currently resides and reasonably intends to continue residing in a primary residence owned by the veteran or a family member of the veteran, what criteria should HUD consider? Should HUD require that the veteran or family member own the home for a specific period of time before qualifying for the program? How long should HUD require the veteran to continue residing in the home after the housing modification or rehabilitation services are provided? How can HUD ensure that the veteran remains in his or her home after the housing modification or rehabilitation services are provided?

The task force recommends that HUD use the same rules as those that are used for the VA special adapted housing program.

What criteria and metrics should be used by HUD to evaluate the impact and effectiveness of the use of funds by qualified organizations?

HUD should evaluate the number of veterans served, the types of adaptations provided, and the quality of stakeholder partnerships formed by the organization.

D. Matching Grant Funds

Should HUD require grantees to provide matching funds that are more than 50 percent of the grant award received by that organization?

The law requires a 50% match. We do not recommend requiring a greater match as that might have the potential for eliminating some worthy organizations. HUD may wish to consider factoring in material and labor as additional contributions.

Should HUD provide a preference for grantees that contribute more than 50 percent?

HUD should not provide a preference solely based on matching capability.

While HUD specifically seeks comment on the foregoing questions, HUD welcomes additional information that will help inform the Program.

A primary purpose of this Program is to assist veterans with disabilities who may need housing modifications but are not eligible for current programs through the Department of Veterans Affairs. The requirements for this Program should reflect that purpose without being overly prescriptive.

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