



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

July 29, 2011

Sandra Henriquez
Assistant Secretary for Public and Indian Housing
U.S. Department of Housing and Urban Development
451 7th Street, S.W., #4100
Washington, DC 20410

Dear Assistant Secretary Henriquez:

On behalf of the Consortium for Citizens with Disabilities (CCD) Housing Task Force, we are writing to express our appreciation for the recently issued PIH Notice 2011-32, Policies and Procedures for Special Purpose Housing Choice Vouchers for Non-Elderly Disabled Families and Other Special Populations. The CCD Housing Task Force is a coalition of national disability organizations which advocates on behalf of the housing needs of people with a variety of disabilities, including developmental disabilities, mental illness, sensory, and physical disabilities. Among the organizations that participate in the CCD Housing Task Force are the Arc, United Cerebral Palsy, Easter Seals, the Bazelon Center for Mental Health Law, United Spinal Association, the National Alliance on Mental Illness, the National Disability Rights Network and the National Multiple Sclerosis Society.

CCD is extremely pleased with the strong protections in this PIH Notice that will help ensure that NED Housing Choice Vouchers (HCVs) allocated by Congress to non-elderly people with disabilities are more effectively targeted to this population. As you know, Congress reaffirmed this policy in 2010 in the Frank Melville Supportive Housing Investment Act (P.L. 111-374). In particular, Congress wanted to make sure that as non-elderly disabled vouchers go through turnover and are reallocated by housing agencies, these targeting requirements remain in place.

CCD is grateful for the numerous provisions in this Notice that bring about greater accountability on the part of agencies that have HCVs originally allocated non-elderly disabled for public housing designation and certain developments (“Frelinghuysen” vouchers), as well as the Section 811 “mainstream” program. In particular, CCD is grateful for critical policies and procedures in the Notice including:

1. Requirements for maintenance of a baseline level of NED vouchers,
2. Reestablishment of NED vouchers in those agencies currently below their minimum allocated level,
3. Leasing of new incremental vouchers allocated by Congress in 2009,
4. Waiting list maintenance requirements to ensure that eligible NED households are able move up lists to access assistance,

5. Reissuance of turnover vouchers across each of the various categories of NED vouchers,
6. Protections to ensure allocation of vouchers in the case of an agency funding shortfall, and
7. New PIC and VMS reporting requirements to ensure proper tracking of these vouchers by agencies.

Finally, CCD would like to thank you and your staff for the provisions in the Notice articulating for housing agencies their obligations to make reasonable accommodations to non-elderly people with disabilities in their voucher programs with respect to

- Exception payment standards,
- Exceptions to subsidy standards,
- Voucher terms,
- Referral services,
- Housing Assistance,
- Special housing types, and
- Earned income disallowance.

Thank you for your leadership in moving forward on this guidance. CCD looks forward to working with you to ensure its full implementation.

Sincerely,

CCD Housing Task Force Co-Chairs:

Bonnie Milstein, Bazelon Center for Mental Health Law
202-467-5730 / bonniem@bazelon.org

Andrew Sperling, National Alliance on Mental Illness
703-516-7222 / andrew@nami.org

T.J. Sutcliffe, The Arc
202-783-2229 / sutcliffe@thearc.org

cc: Danielle Bastarache, Director, Office of Housing Voucher Programs