

Date: 10/28/13

RE: MSHDA Administrative Plan- Voucher Feedback & Additionally Qualified Allocation Plan (QAP) / Tax Credit Program Feedback

To: MSHDA Staff/ Jackie Blackenship, Christopher LaGrand

From: David Layne, Housing Specialist- Michigan's Nursing Facility Transition (NFT) TEAM

Michigan's TEAM of 20 Housing Specialist have helped successfully transitioned 4000-5000 Michigan residents (elderly & adults with disabilities) back to community living with the necessary supports over the last 4 years.

Much of this success is due to our wonderful working relationship with MSHDA staff.

Michigan was one of 13 states initially funded to do this vital work, but over 40 states now operate under federal Money Follows the Person Funding that created these programs. Unlike entitlement programs, this program saves money for both the federal & state budgets; instead of \$6000-7000 monthly per resident in a Medicaid bed at a Michigan nursing facility, this program averages \$2200 in-home care (2013 Kaiser Report).

For us to continue this remarkable success, we must overcome barriers together mostly in regards to creating more truly affordable housing. A person with a disability receiving SSI gets less than \$700 monthly income subsidy. However HUD tells us ironically that is approximately the cost of a Michigan modest one-bedroom apartment. Without further subsidies there is no way to make this work.

Recent national communication including from the Secretary of HUD, Department of Justice, clearly direct us to work together to further BOTH the intent of The Supreme Court "OLMSTEAD" ruling that folks with disabilities live as independently as they are able, and in furthering the heart of Fair Housing laws that they have housing "choices" like the rest of us.

It is important to note that the Michigan Office of Services to the Aging (2012) reported their needs assessment showed 45% of the elderly report having a disability; nearly 1 in 2 elderly means they are part of this same conversation.

**Issue 1:** HUD passed HEARTH Act homeless language to guide many of their programs including McKinney, Emergency Solutions Grants, and more. But ... the Hearth Act was *never* intended to be a guiding language for housing vouchers (Technical Assistance Collaborative, CMS consultant). Contrary to MSHDA's decision to adopt this language for the voucher program, several HUD directives have strongly suggested voucher preferences for disabled citizens. While there is an Oakland/ Macomb county voucher set aside for those on our program, it is under-utilized. I understand 125 vouchers were initially funded but last I heard only around 60 are currently in use.

**Issue 2:** We must have an overall balanced approach on our voucher programs to achieve true “choice” including substantially more tenant based vouchers, HUD 811 integrated project based vouchers (MSHDA worked VERY hard to get 2012 NOFA vouchers, and has stated they will continue to apply for future NOFA’s) **and** some (NOT all) 100% supportive housing – project based vouchers for the disabled population, as part of the plan to make Tax Credit developments affordable to lower income populations. We additionally need HOME fund Tenant Based Rental Assistance (TBRA) as well for the “in between” periods where voucher programs are closed.

**Issue 3: Any ongoing QAP MUST continue to have Supportive Housing Preferences set aside including BOTH integrated AND 100% projects for special needs populations.**

The time has never been better for MSHDA, HUD, service agencies to plan together to solve unacceptable shortages in truly affordable housing options for both our disabled & elderly populations.

Right now under the direction of the Michigan Disability Housing Workgroup, partner organizations including CMH housing providers, Disability Networks, Medicaid Waiver- Agencies, Michigan Disability Rights Coalition, are putting together language on needs/ barriers to begin to unite the Michigan OLMSTEAD Coalition, Michigan Developmental Disability Council, Area Agencies on Aging, Michigan Eldercare Law, and *other* partner agencies in serving the disabled and elderly populations. The “next step” in this process will be to include both MSHDA & HUD in the solutions planning process as recommended by the Secretary of HUD (June 2013). **Our goal- is a unified Michigan Olmstead Housing Plan.**

I look forward to our future important work together. This cannot be solved in a vacuum, rather it needs to be part of an overall plan; hence my combining Voucher/ QAP feedback into one document.

A quarter million Michigan residents receive SSI benefits, 45% of them in Metro Detroit. In 2012 the Michigan Disability Rights Coalition estimated nearly 200,000 more are NOT in the system getting benefits they qualify for. During our 2012 HUD 811 NOFA application process, 400 residents were *currently* living in institutions due to affordable housing barriers. Many more are *at risk* of institutionalization. We cannot consider this acceptable any longer. We must ALL do our part to plan very real doable timely solutions together.