

June 1998

# PUBLIC HOUSING

## Impact of Designated Public Housing on Persons With Disabilities



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**Resources, Community, and  
Economic Development Division**

B-279436

June 9, 1998

The Honorable Jerry Lewis  
Chairman  
The Honorable Louis Stokes  
Ranking Minority Member  
Subcommittee on VA, HUD, and  
Independent Agencies  
Committee on Appropriations  
House of Representatives

The Honorable Rodney Frelinghuysen  
House of Representatives

Until 1992, all housing authorities were obligated by law to provide equal access to units in developments known as “elderly buildings” to both persons aged 62 or older and persons with disabilities, regardless of age. The Housing and Community Development Act of 1992, among other things, allowed public housing authorities, through allocation plans approved by the Department of Housing and Urban Development (HUD), to designate these units for either or both types of tenants. While elderly persons with disabilities remained eligible for elderly-only housing, younger persons with disabilities were no longer eligible to move into those buildings and needed other housing options.<sup>1</sup> To provide options, HUD set aside incremental (new) Section 8 rental housing certificates and vouchers for low-income persons with disabilities.<sup>2</sup> The Congress appropriated \$50 million for fiscal year 1997 and \$40 million for fiscal year 1998 for incremental certificates and vouchers for the exclusive use of persons with disabilities. Of the \$90 million, \$45 million was earmarked for housing authorities with approved allocation plans, and \$45 million was earmarked for housing authorities that could identify the impact on persons with disabilities of elderly-only preferences established by privately owned projects in their communities.

Concerned about the availability of housing for low-income persons with disabilities who can no longer move into public housing apartments that have been designated for the elderly, the Subcommittee on VA, HUD, and

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<sup>1</sup>Public housing authorities may not force tenants with disabilities to move out of units they subsequently designate as being only for elderly residents.

<sup>2</sup>Persons using Section 8 certificates and vouchers pay a portion of their income—usually 30 percent—toward renting a privately owned apartment that meets HUD’s rent requirements and housing quality standards. HUD generally pays the difference between the tenant’s portion and the total rent charged for a unit or a rent standard established by HUD, in the case of vouchers.

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Independent Agencies of the House Committee on Appropriations directed us, in its July 11, 1997, report (H. Rep. 105-175) accompanying the fiscal year 1998 VA, HUD, and Independent Agencies appropriations bill, to undertake a study. Specifically, the Subcommittee asked us to assess (1) the impact of the Housing and Community Development Act of 1992 on the availability of public housing for persons with disabilities and (2) how incremental Section 8 certificates and vouchers that were made available since the passage of the 1992 act were assisting persons with disabilities seeking affordable rental housing.<sup>3</sup> As requested, we also developed estimates of the number of households that may meet HUD's definition for persons with disabilities. Appendix I describes in depth the methodology used to determine the size of this population and HUD's definition for persons with disabilities.

To obtain information for this report, we surveyed, out of the 3,200 housing authorities nationwide, all 96 housing authorities that either had HUD-approved allocation plans or received certificates or vouchers for the exclusive use of persons with disabilities as of November 1, 1997. All 96 housing authorities responded to our survey. We supplemented the survey results by conducting six case studies at housing authorities around the country. We also interviewed housing officials at the federal and local levels as well as representatives of national associations of persons with disabilities and the elderly. Our methodology is described further in appendix II. Our case study analyses appear in appendix III.

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## Results in Brief

The provisions of the Housing and Community Development Act of 1992 allowing public housing authorities to designate units as elderly-only have had little impact on the availability of public housing for people with disabilities. Seventy-three of the 3,200 public housing authorities had allocation plans approved by the Department of Housing and Urban Development as of November 1, 1997, allowing them to designate 24,902 of their units as elderly-only, approximately 36 percent of their housing stock for the elderly and persons with disabilities. Nearly all of these designated units had been available previously to tenants who were elderly or who had disabilities but were younger than 62, although few were actually occupied by younger people with disabilities. Our survey found that, as of November 1, 1997, the number of elderly residents and residents with disabilities in these and other housing units for which they were eligible had not changed substantially since the housing authorities began

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<sup>3</sup>The Subcommittee also requested that we assess the impact of the 1992 act on the availability of privately owned, HUD-subsidized rental housing for low-income persons with disabilities. We will issue a separate report on those findings.

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submitting allocation plans. The number of younger tenants with disabilities living in housing designated for the elderly had declined by about 1,100—or about 25 percent—at the 53 housing authorities that provided complete occupancy data. Designating public housing units as elderly-only may have more impact in the future, depending on how many more housing authorities opt to do so and on what the housing alternatives are for younger people with disabilities.

It is too soon to determine the extent to which the Section 8 rental certificates and vouchers set aside for persons with disabilities have helped meet this population's housing needs. Although 59 housing authorities reported that they received 4,943 certificates and vouchers, about 1,900 certificates and vouchers had just been made available to the housing authorities as of November 1, 1997. The authorities had not had enough time to issue them to eligible persons with disabilities. Of the approximately 3,000 certificates and vouchers that were available to housing authorities as of November 1, 1997, the authorities reported that they issued about 1,600 to persons with disabilities who, in turn, used 1,162 to obtain private rental housing. About 18 percent of the users had been living in public housing that had been designated for the elderly—indicating little movement by persons with disabilities residing in housing now designated as elderly-only. The other 82 percent had been on waiting lists for public housing or for Section 8 rental certificates and vouchers. How successful rental certificates and vouchers will be in providing housing alternatives for people with disabilities will be influenced by several factors, including statutory restrictions, local housing markets, and the willingness of tenants with disabilities to use the certificates or vouchers. Moreover, according to the housing authorities, those persons with disabilities who used certificates and vouchers to find housing required greater assistance than other recipients.

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## Background

The definition of “elderly families” used to determine eligibility for certain public housing has evolved over time. Until 1992, the term encompassed low-income families whose head, spouse, or sole member was aged 62 or older, as well as low-income individuals with disabilities, regardless of age. All housing authorities were obligated by law to provide equal access to units in developments known as “elderly buildings” to both elderly persons and persons with disabilities. These developments usually consisted of efficiencies and one-bedroom units rather than the multiple-bedroom units typical of family housing.

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As the number of younger persons with disabilities residing in “elderly housing” increased, the complaints from their elderly neighbors also increased. Elderly residents cited the differences in values and lifestyles they had with the younger residents as impediments to safe and decent housing for the elderly. In 1992, we reported that nonelderly tenants with mental disabilities occupied between 8 and 10 percent of the units in public housing for the elderly, but were, according to public housing authorities (PHA),<sup>4</sup> causing a disproportionate share of problems for the elderly residents as well as for the PHAs’ management and staff.<sup>5</sup> Problems included complaints about noise, visitors, crime, and disrespectful attitudes of the younger residents toward the elderly residents.

It was primarily this increase in the number of tenants with disabilities in elderly housing and the resultant complaints that led the Congress to promote designated housing in the 1992 act. First, the 1992 act established a definition of elderly persons that no longer included persons with disabilities under the age of 62. Second, the act allowed PHAs to seek approval for designating housing as elderly-only, disabled-only, or elderly and disabled through allocation plans submitted to HUD. The 1992 act laid out criteria for the contents of allocation plans and standards that HUD should use to approve the plans.<sup>6</sup> Specifically, the law stipulated that approval is to be granted to only PHAs that demonstrate in their allocation plans that designation is necessary to achieve the housing goals for their jurisdictions and to meet the needs of the jurisdictions’ low-income population. PHAs that do not have approved allocation plans must continue to treat persons with disabilities and the elderly equally and allow both to

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<sup>4</sup>In this report, the terms “public housing authority” and “PHA” refer only to those housing authorities that own housing units. Some housing authorities own no housing units but do provide Section 8 rental assistance that recipients can use to rent privately owned housing. PHAs can also provide Section 8 rental assistance.

<sup>5</sup>Public Housing: Housing Persons With Mental Disabilities With the Elderly (GAO/RCED-92-81, Aug. 12, 1992).

<sup>6</sup>In the Housing Opportunity Program Extension Act of 1996, the Congress, among other things, modified the requirements for allocation plans to designate housing to make the application process less onerous for PHAs. It also directed HUD to conduct a limited review of allocation plans submitted for approval. It removed the requirement that PHAs must rent to persons with disabilities any unit in a designated building that had been vacant for more than 60 days and that was ready for occupancy. It also stipulated that a plan was to be automatically approved if HUD failed to notify the PHA of the plan’s approval or disapproval within 60 days of its submission. And it extended the effective terms of allocation plans to 5 years, after which PHAs can request 2-year extensions.

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live in elderly buildings on a first-come, first-serve basis.<sup>7</sup> Finally, the act allowed owners of privately owned, HUD-assisted projects that were designed primarily for occupancy by elderly families to designate housing for the elderly through the establishment of elderly preferences or restrictions. Unlike PHAs that designate housing, however, owners of privately owned projects do not need to seek HUD's approval prior to designation or to notify HUD once designation occurs.

To offset the potential loss of housing for persons with disabilities and to provide them with greater housing choices, HUD set aside Section 8 rental housing certificates and vouchers for their use. Through appropriations for fiscal years 1997 and 1998 for incremental certificates and vouchers, the Congress augmented HUD's ability to set aside Section 8 assistance for persons with disabilities displaced by public and privately owned housing designated for the elderly. Separately, HUD has also made Section 8 certificates and vouchers available to provide mainstream housing opportunities for persons with disabilities. The mainstream program is open to all housing authorities, not just those with approved allocation plans. It is popular with persons with disabilities who want to find housing in the private sector (known as "housing of choice") rather than in public or project-based housing.

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## Allocation Plans Have Had Little Impact Thus Far

Only 73 of the nation's 3,200 PHAs had allocation plans as of November 1, 1997.<sup>8</sup> These PHAs typically elected to designate units for the elderly or for the elderly and persons with disabilities combined. Of all the 73 PHAs with allocation plans, 64 designated a total of 24,902 housing units—approximately 36 percent of their housing stock for the elderly or persons with disabilities—as elderly-only. As a result, these units may no longer be available to persons with disabilities. However, persons with disabilities occupied only a portion of these units in the past, and most who resided in those units still do. Specifically, 53 of the 64 PHAs that designated units as elderly-only and provided complete occupancy data in our survey reported that when they submitted their plans, about 4,100 persons with disabilities were occupying units now designated for the elderly. The number had fallen to about 3,000 as of November 1, 1997.

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<sup>7</sup>Here and elsewhere we refer to people under the age of 62 who have disabilities simply as persons with disabilities. In all instances, we are referring to households in which the head of the household or spouse is under the age of 62 and has a disability. We do not include households in which another family member has a disability. Elderly persons with disabilities are counted among elderly households.

<sup>8</sup>As of April 16, 1998, HUD had approved an additional 18 allocation plans, bringing the total number of PHAs with approved plans to 91. According to HUD, these 91 PHAs are designating over 29,000 efficiencies and one-bedroom apartments for the elderly only.

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Overall, there has been little change in the number of persons with disabilities residing in units now designated as elderly-only, disabled-only, and elderly and disabled or in other undesignated units available to the elderly and persons with disabilities. One reason is that more than half of the PHAS with allocation plans had them approved as recently as 1996 or 1997, so the designations are relatively new. Another reason is that PHAS are not permitted to force residents with disabilities to move out of housing newly designated for the elderly and residents with disabilities may not wish to relocate. (See app. IV for our survey instrument and the complete responses to our survey.)

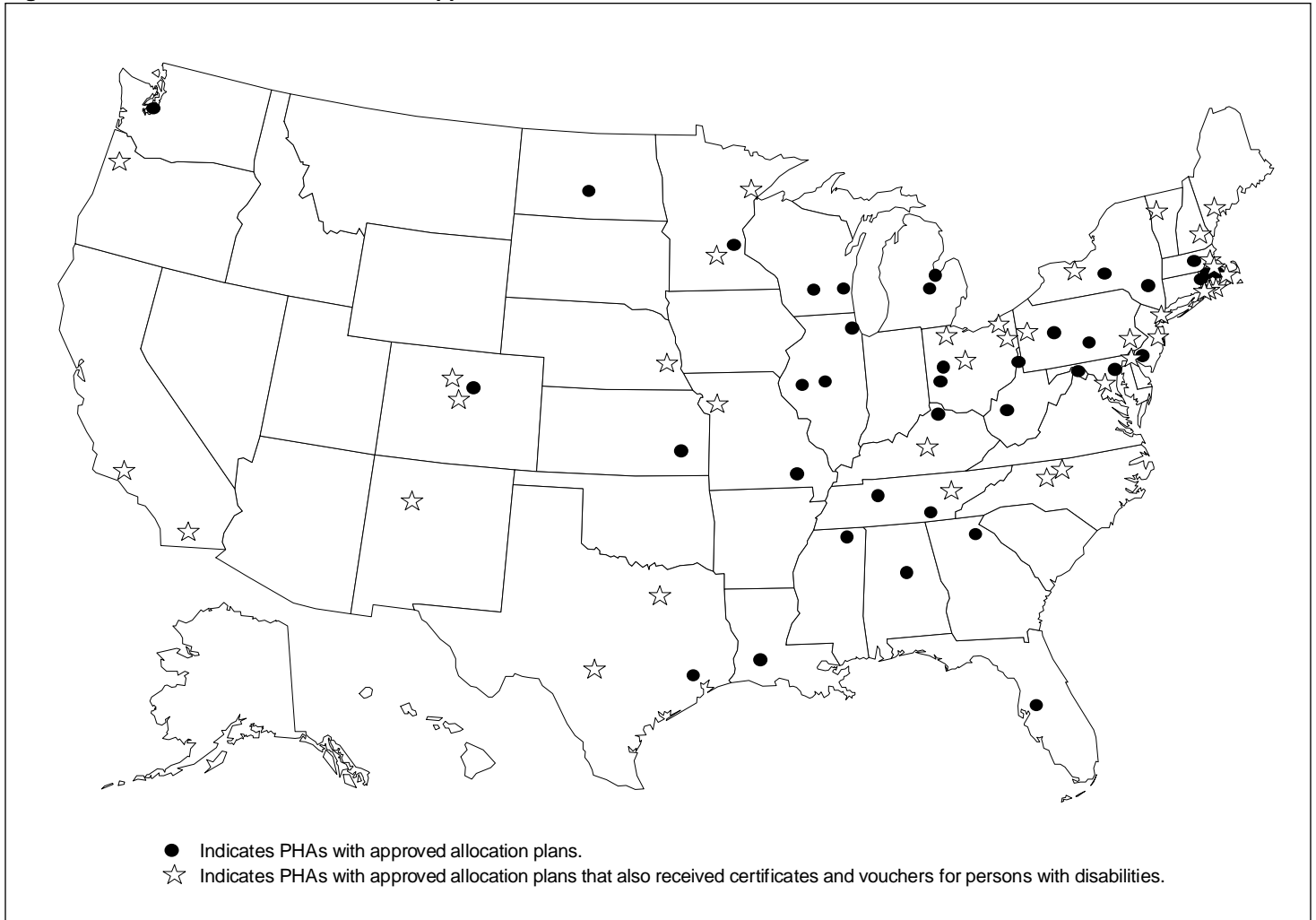
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### Few PHAs Have Approved Allocation Plans

According to HUD, 73 out of 3,200 PHAS had approved allocation plans as of November 1, 1997. HUD denied applications from another 22 PHAS, and 2 other PHAS withdrew their applications. Although some plans were approved as early as 1994, over half of them were approved in 1996 and 1997. The 73 PHAS with approved allocation plans represent a cross-section of housing authorities in terms of size and are located in 35 states. Twenty-four PHAS with approved allocation plans had fewer than 500 units of public housing, 16 had between 500 and 1,249 units, and 33 had 1,250 or more units. All but one of these PHAS—Toccoa, Georgia—reported designating housing units as part of their allocation plans. (See fig. 1.)



Figure 1: Locations of the 73 PHAs With Approved Allocation Plans, as of November 1, 1997



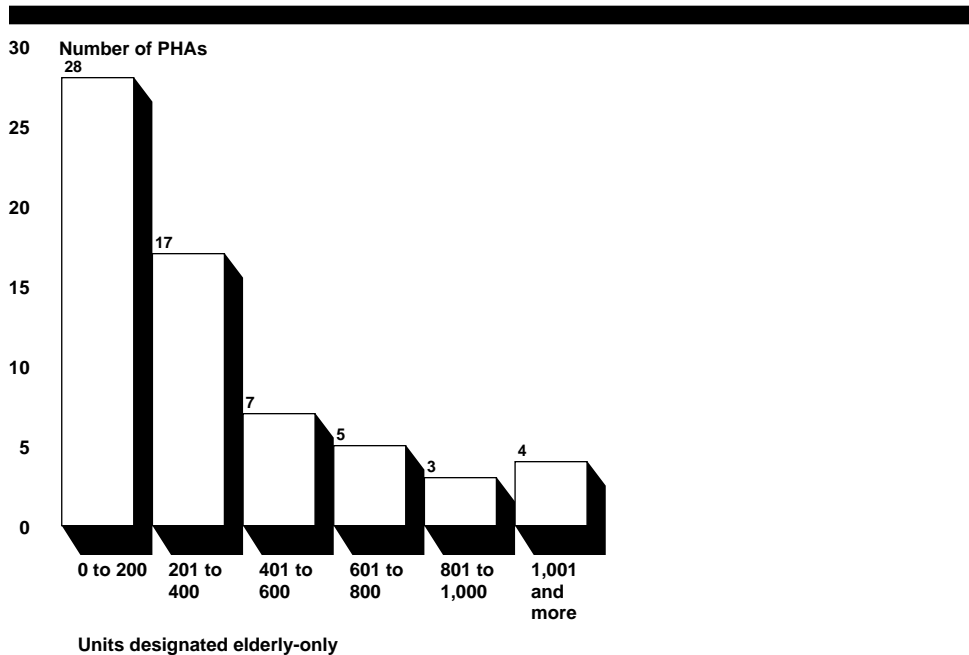
Source: HUD.

### Most Approved Allocation Plans Designated Housing Units as Elderly-Only

Most of the 73 PHAs with allocation plans designated units as elderly-only. Specifically, 64 of the PHAs that have approved allocation plans reported in our survey that they designated 24,902 units as elderly-only, meaning that the units will no longer be rented to new tenants who are not at least 62 years old. Five PHAs accounted for more than a third of the units designated as elderly-only: Worcester, Massachusetts; Milwaukee, Wisconsin; Minneapolis, Minnesota; San Antonio, Texas; and Chicago,

Illinois. Seven PHAs designated 50 or fewer units as elderly-only. (See fig. 2.)

**Figure 2: Number of Units Designated as Elderly-Only**



Fewer units were designated as disabled-only or elderly and disabled. (See table 1.) Among the 64 PHAs that designated units only for the elderly, 19 also designated units in which either the elderly or persons with disabilities could be housed, and 7 also designated units as disabled-only. Four of the PHAs used all three of the possible designations. One PHA with an approved allocation plan opted not to designate any housing units.

**Table 1: Designation of Public Housing Units by 73 PHAs With Approved Allocation Plans, as of November 1, 1997**

Type of designation in allocation plan	Number of PHAs <sup>a</sup>	Number of designated units
Elderly-only	64	24,902
Disabled-only	13	788
Elderly and disabled	29	8,366
No units designated	1	N/A

<sup>a</sup>The total of the numbers in this column exceeds the 73 PHAs with approved allocation plans because some of the PHAs designated more than one type of housing.

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Finally, nonelderly persons with disabilities and the elderly were eligible for an additional 23,870 units at the 73 PHAS with approved allocation plans. These units were not designated as elderly- or disabled-only in the PHAS' allocation plans but were available to these persons nonetheless. Over half of these units belonged to three PHAS: Chicago had 5,320; Baltimore, 3,662; and Minneapolis, 3,572.

Of the 24,902 units designated for elderly residents, 24,471 were previously available to both the elderly and to younger persons with disabilities. About 19 percent of the units that were previously available to both types of tenants were occupied by younger persons with disabilities when the PHAS submitted their allocation plans.<sup>9</sup> An additional 367 units designated as elderly-only were newly constructed or acquired, and 64 were in other types of public housing units.

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### Occupancy Has Changed Little Across All Units Available

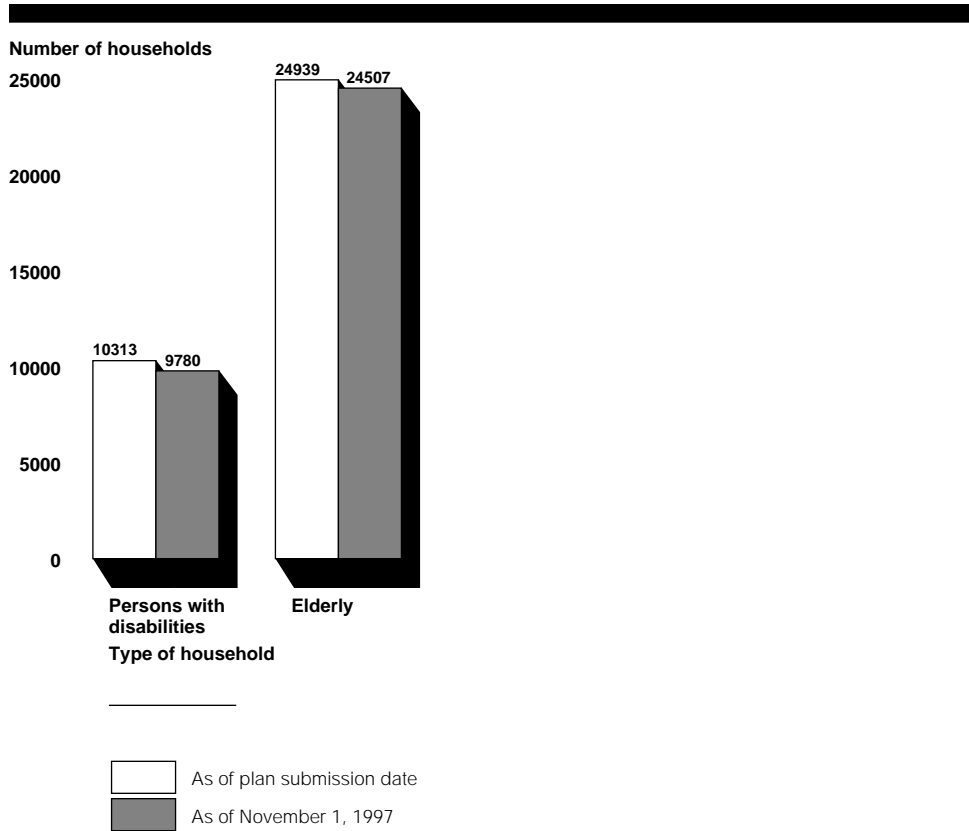
Overall, PHAS reported in our survey that occupancy by both persons with disabilities and the elderly declined slightly across all units between the time the PHAS submitted their allocation plans and November 1, 1997.<sup>10</sup> Specifically, the 56 PHAS that provided complete occupancy data reported that occupancy by persons with disabilities in units now designated for the elderly or persons with disabilities or available to either declined by 533 households—about a 5-percent decrease. The number of units occupied by the elderly declined by 432—not quite a 2-percent decrease. (See fig. 3.) Those PHAS that had specifically designated units as elderly-only reported the same pattern as did PHAS with allocation plans generally.

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<sup>9</sup>This figure is based on the survey responses from 53 PHAS that designated elderly-only units and provided complete occupancy data. The remaining 11 PHAS that designated elderly-only units did not provide complete data on occupancy of these units.

<sup>10</sup>This discussion includes units that are designated for or that are available to the elderly and persons with disabilities but are not designated as such. It excludes 17 PHAS with approved allocation plans that did not provide complete occupancy data.

**Figure 3: Change in Occupancy of Designated Units and Undesignated Elderly and Disabled Units at PHAs With Approved Allocation Plans**



Notes: Data are for the 56 PHAs with allocation plans that provided complete occupancy data in our survey. Occupancy data were not available for 17 PHAs with allocation plans.

Occupancy data are for those units that on November 1, 1997, were designated elderly-only, disabled-only, or elderly and disabled—or that were undesignated but available to persons with disabilities and the elderly.

**Change in Occupancy Varied by Type of Designated Units**

While overall occupancy changed little, the occupancy of persons with disabilities varied depending on whether the units were designated as elderly-only or elderly and disabled. Changes in occupancy also varied by individual PHA. Of the 53 PHAs that designated units as elderly-only and provided complete occupancy data for those units in their survey responses, 25 reported a decline in the number of persons with disabilities residing in elderly-only units. The total decrease of 1,066 occupants represented about one-quarter of the persons with disabilities residing in those PHAs' units designated as elderly-only. The Chicago Housing Authority accounted for much of this decline, reporting 419 fewer people

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with disabilities residing in units now designated elderly-only. Thirteen PHAs reported no change, and 15 reported increases. One PHA reported an increase of 52 nonelderly people with disabilities occupying units that had been designated elderly-only. According to an official at this PHA, the allocation plan permits the PHA to accept near-elderly persons—including those with disabilities—if there is an insufficient number of elderly persons to occupy designated units.<sup>11</sup> The increase in persons with disabilities at this PHA is due to the large number of near-elderly persons with disabilities who moved into designated units after the PHA submitted its allocation plan.

Forty PHAs that designated units as elderly-only reported that 618 people with disabilities had moved out of the elderly-only units. Some of these PHAs also reported where these persons with disabilities went: 80 moved into other public housing units; 138 moved into private housing using Section 8 certificates or vouchers; and 275 moved into other housing.<sup>12</sup>

The PHAs that designated units for the elderly and disabled combined or that had undesignated units available for the elderly and persons with disabilities reported a total increase in the number of persons with disabilities occupying those units. The 47 PHAs in this category that provided complete occupancy data reported 472 more of these units were occupied by persons with disabilities—about a 7-percent increase. The 13 PHAs that designated 788 of their units as disabled-only reported that occupancy of those units by persons with disabilities increased by 20 households—more than a 4-percent increase—between the time they submitted their allocation plans and November 1, 1997. (See table 2.)

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<sup>11</sup>HUD defines near-elderly persons as those between the ages of 50 and 62.

<sup>12</sup>Data on where persons with disabilities moved were reported by between 23 and 25 PHAs that designated units as elderly-only.

**Table 2: Changes in Occupancy of Elderly-Only Units, Disabled-Only Units, and Elderly and Disabled Units**

Type of public housing unit	Persons with disabilities			Elderly		
	As of date of plan	As of Nov. 1, 1997	Change	As of date of plan	As of Nov. 1, 1997	Change
Elderly-only <sup>a</sup>	4,094	3,028	-1,066	14,814	15,828	1,014
Disabled-only <sup>b</sup>	445	465	20	218	207	-11
Elderly and disabled <sup>c</sup>	6,554	7,026	472	11,908	11,013	-895

<sup>a</sup>Data are for the 53 PHAs for which there were complete occupancy data; they accounted for 21,354 units designated as elderly-only.

<sup>b</sup>Data are for all 13 PHAs that designated units as disabled-only; they accounted for all 788 such units.

<sup>c</sup>Data are for the 47 PHAs for which complete occupancy data were available that designated 7,311 units as elderly and disabled and had 16,194 undesignated units available to the elderly and persons with disabilities.

## Designating Housing Has Had Little Impact on Persons With Disabilities for Various Reasons

One reason the provisions in the 1992 act allowing PHAs to designate units for the elderly have had little impact on the availability of public housing for persons with disabilities is that so few PHAs have sought to use the provisions thus far. While we did not attempt to survey the more than 3,100 PHAs that have not submitted allocation plans to designate housing, HUD officials told us that most PHAs do not view developing the plans as a priority or do not believe that designated housing is necessary. Moreover, HUD agreed that designated housing has had little impact on housing opportunities for persons with disabilities. HUD cited the collaborative approach it uses to review plans, coupled with the availability of targeted Section 8 certificates and vouchers, as the factors that have minimized the potential impact.

Two-thirds of the PHAs responding to our survey indicated that their designation of housing to date has neither helped nor hindered their ability to meet the housing needs of persons with disabilities. Officials at the three PHAs we visited that had allocation plans confirmed that designating units for the elderly had not had an impact on persons with disabilities. They noted that persons with disabilities were not required to move out of the designated units and that many of them had decided not to relocate. For example, an official at the Dallas Housing Authority said that many of the tenants preferred to stay where they were. At the Fall River Housing Authority, persons with disabilities residing in units designated as elderly-only were offered Section 8 certificates. Some of these residents

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were able to use these certificates to find housing in the private market, while the other residents remained in their newly designated units.

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## Impact of Section 8 Certificates and Vouchers Is Not Yet Known

The extent to which Section 8 rental certificates and vouchers for persons with disabilities have helped meet the demand for affordable housing for persons with disabilities is not yet clear. Fifty-nine housing authorities reported receiving 4,943 certificates and vouchers for persons with disabilities. Thirty-three of these 59 authorities also designated units as elderly-only. About two-thirds of the PHAs with elderly-only units reported that they received more certificates and vouchers than the number of persons with disabilities residing in their elderly-only units. However, as of November 1, 1997, only about one-fourth of the total 4,943 certificates and vouchers reported had been used successfully. Officials from HUD and housing authorities that we surveyed gave various reasons for certificates and vouchers not being used. For instance, because of the time involved in awarding certificates and vouchers to housing authorities, many had not been in a position to issue the new rental certificates and vouchers by November 1, 1997. Statutory restrictions on the funds have limited their use. Persons with disabilities seeking to use certificates and vouchers might have had difficulty finding affordable, privately owned housing in their communities. And many tenants with disabilities might not be interested in moving out of the public housing units they now occupy.

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## Section 8 Assistance Has Been Made Available for Persons With Disabilities in Two Ways

The Section 8 Rental Certificate and Rental Voucher program is a federally funded affordable housing option administered by the local housing authorities, which issue the certificates and vouchers to eligible tenants.<sup>13</sup> HUD has made Section 8 certificates and vouchers available for persons with disabilities in two ways: (1) in connection with designated public or privately owned, HUD-subsidized housing or (2) through a mainstream housing opportunities program.

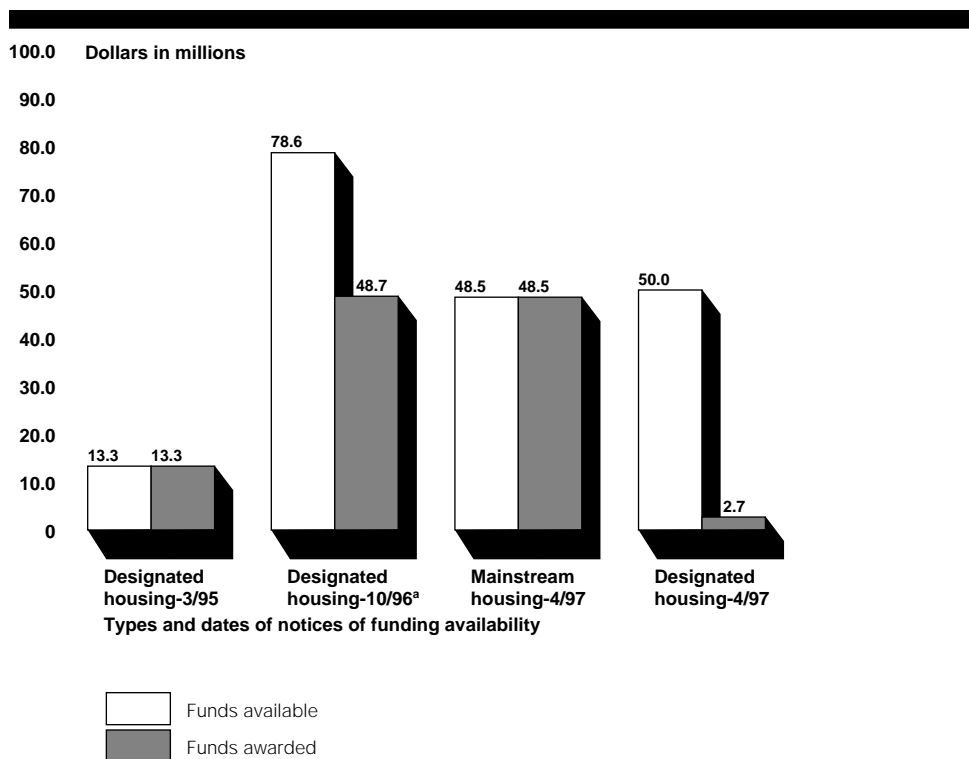
Since 1992, a total of \$278.9 million has been earmarked for certificates and vouchers for persons with disabilities. As of November 1, 1997, HUD had made \$190.4 million available through four notices of funding

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<sup>13</sup>Households using certificates are limited to paying not more than 30 percent of their adjusted income, or 10 percent of their gross income, whichever is greater, for rent. Households using vouchers can seek housing with rents that exceed the rent payment standard established by HUD. Those households are allowed to pay more than 30 percent of their income for rent.

availability.<sup>14</sup> As figure 4 shows, only the funds from the March 1995 notice and the April 1997 notice for the mainstream program have been totally awarded to the housing authorities. HUD told us that between November 1997 and March 1998, another \$15 million made available through the October 1996 notice was awarded to PHAs with newly approved allocation plans. HUD expects all the funds from the October 1996 notice to be spent by the end of fiscal year 1998.

**Figure 4: Funds Available and Awarded for Section 8 Certificates and Vouchers for Persons With Disabilities, as of November 1, 1997**



<sup>a</sup>As of March 3, 1998, an additional \$15 million was awarded to PHAs with newly approved allocation plans.

Source: HUD.

The April 1997 funding notice making \$50 million available to PHAs was the result of a set-aside in HUD's fiscal year 1997 appropriation. The Congress

<sup>14</sup>The \$278.9 million includes \$40 million appropriated in fiscal year 1998 to offset the impact of designated public and privately owned housing and \$48.5 million appropriated in the same year for the mainstream program. HUD did not make this \$88.5 million available until April 30, 1998.



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set aside this money to fund Section 8 assistance to persons with disabilities affected by designated public and private housing. Half of the \$50 million was earmarked for housing authorities with approved allocation plans, and the other half was earmarked for housing authorities that could identify the impact on persons with disabilities of elderly-only preferences established by privately owned projects in their communities. As of November 1, 1997, none of the \$25 million for housing authorities with approved allocation plans had been spent. According to HUD officials, this \$25 million will be used once all of the funding made available in the October 1996 notice is awarded. From the \$25 million intended to offset the impact of elderly-only preferences established by privately owned projects, HUD had awarded \$2.7 million to five PHAS. Appendix V provides further discussion of Section 8 certificates and vouchers for persons with disabilities.

A total of 59 housing authorities reported receiving Section 8 certificates and vouchers for persons with disabilities. (Fig. 5 shows their locations.) Six of these housing authorities received awards for both designated housing and mainstream opportunities. They are Rochester, New York; Butler County, Pennsylvania; Kansas City, Missouri; Wilmington, Delaware; Greensboro, North Carolina; and Salem, Oregon.

Figure 5: Locations of 59 Housing Authorities That Received Section 8 Certificates and Vouchers, as of November 1, 1997



Source: HUD.

### Few of the Certificates and Vouchers Awarded Have Been Used

Fifty-nine of the 96 housing authorities we surveyed reported that they had received 4,943 certificates and vouchers for persons with disabilities from one or more of the four notices of funding availability. However, because of the length of the process used to make awards to housing authorities, many were not in a position to issue the new rental certificates and

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vouchers awarded from one of the 1997 notices by November 1, 1997.<sup>15</sup> Of the approximately 3,000 certificates and vouchers that were available to housing authorities as of November 1, 1997, 1,558 had been issued to persons with disabilities who, in turn, had used 1,162 to obtain private rental housing and had turned back 174 unused, according to the authorities. Some housing authorities reported that their recipients were still in the process of searching for housing. Persons with disabilities generally have 60 days to use certificates and vouchers and may ask for extensions if necessary.

Thirty-three PHAs reported that they designated units as elderly-only and received 2,982 certificates and vouchers, primarily in connection with their designation. About two-thirds of these PHAs with elderly-only units reported that they received more certificates and vouchers than the number of persons with disabilities residing in their elderly-only units.<sup>16</sup> These PHAs issued 1,236 of these certificates and vouchers to persons with disabilities. Of the certificates and vouchers issued, 960 had been used by persons with disabilities to obtain housing and 172 had been turned back to the housing authorities unused. The remaining recipients were still looking for housing.

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## Funds for Certificates and Vouchers Remain Unspent

HUD still has funds remaining for certificates and vouchers associated with designated housing, but all the funds for the mainstream program have been awarded. According to HUD officials, there is not much demand for the designated housing certificates and vouchers. The Section 8 Certificates and Vouchers Director told us that PHAs prefer to apply for the mainstream housing opportunities program for persons with disabilities because it is less restrictive, it does not require PHAs to submit allocation plans, and the funds have 5-year terms.<sup>17</sup>

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<sup>15</sup>According to HUD's data, the annual contribution contracts for 927 certificates and vouchers awarded to 15 housing authorities were executed on November 1, 1997. Contracts for an additional 967 certificates and vouchers were executed on October 1, 1997. Consequently, it is not likely that housing authorities would have issued these 1,894 certificates and vouchers to persons with disabilities by November 1, 1997.

<sup>16</sup>According to a HUD official, this is due to the fact that allocation plans must address the needs of all the groups affected by designated housing. The certificates and vouchers are often the additional resources that PHAs use to address the needs of persons with disabilities who are on the waiting list for public housing but are no longer eligible for units that have been designated elderly-only.

<sup>17</sup>The certificates and vouchers have had different terms, reflecting the amount of budget authority that the Congress provides to HUD for a given year to fund certain certificates and vouchers. The terms have no impact on how long a recipient can use a certificate or voucher.

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HUD officials also told us that the restrictions placed on the \$50 million the Congress set aside for persons with disabilities in the fiscal year 1997 appropriation made the funds difficult to award. Consequently, HUD worked with the Congress to make the language less restrictive for the \$40 million set aside in the fiscal year 1998 appropriation. The language now states that if the funds cannot be awarded to PHAs that have designated housing or that have identified the impact on persons with disabilities of elderly preferences established by privately owned projects, then the Secretary of HUD may make the remaining funds available for the mainstream program. This language is retroactive to the remaining funds from the fiscal year 1997 appropriation. On April 30, 1998, HUD published a notice of funding availability to disseminate the \$87.3 million from these fiscal years and the \$48.5 million earmarked for the fiscal year 1998 mainstream program.

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## Section 8 Assistance Has Had a Minimal Effect on the Overall Occupancy Levels

Our survey found that the number of persons with disabilities living in public housing units managed by those PHAs that have designated housing and received certificates and vouchers actually increased by 198 between the time the PHAs submitted their allocation plans and November 1, 1997.<sup>18</sup> Similarly, occupancy by persons with disabilities increased by 197 households at the PHAs that designated elderly-only units and received certificates and vouchers and that provided complete occupancy data. Most of the persons with disabilities using the certificates or vouchers were not tenants in newly designated units; rather, they had been on the PHAs' waiting lists for either public housing or Section 8 assistance. As shown in figure 6, only 18 percent of the 1,147 certificates and vouchers whose recipients housing authorities were able to identify were used to move persons with disabilities out of public housing.<sup>19</sup> Fifty-five percent were used by persons with disabilities who had been on the PHAs' public housing waiting lists, and 27 percent were used by persons with disabilities who had been on the PHAs' Section 8 waiting lists.<sup>20</sup>

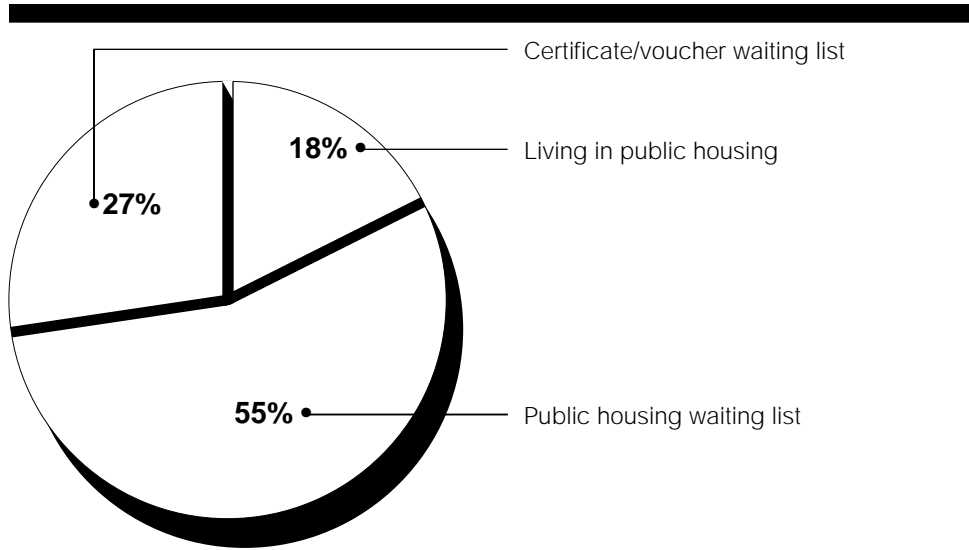
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<sup>18</sup>Data are for 29 PHAs that had approved allocation plans and reported receiving certificates and vouchers and that provided complete occupancy data in their survey responses. Data were incomplete for eight PHAs.

<sup>19</sup>Some housing authorities reported that they did not track whether the recipients of Section 8 assistance were previously on waiting lists or living in public housing.

<sup>20</sup>A person with disabilities might simultaneously have been on one or more waiting lists and/or living in public housing.

**Figure 6: Circumstances of Persons With Disabilities Using Section 8 Certificates and Vouchers Set Aside for Them**



Note: A person with disabilities might simultaneously have been on one or more waiting lists and/or living in public housing.

The 33 PHAs that made elderly-only designations and received certificates and vouchers reported a very similar pattern of use. Our survey data support the view that tenants with disabilities may be reluctant to move from what they perceive to be a stable, known housing situation into an unknown situation. Those on the waiting lists, however, are seeking affordable housing opportunities and therefore may be more willing to use the certificates and vouchers to improve their housing situation.

**Certificates and Vouchers Are Not Always the Optimal Housing Choice**

Depending on the resident and on the housing market, Section 8 certificates and vouchers may or may not be as preferable as public housing. Some PHA officials told us that not every person with disabilities residing in public housing that has been newly designated as elderly-only wants to move. Tenants may want to stay because they have a network of friends nearby, supportive services, and available transportation services. Moreover, moving to Section 8 housing means paying security deposits, which would be an added financial burden for these tenants. In addition, some tenants believe that a certificate or voucher would not be as permanent as public housing. Even at those PHAs that provide incentives,

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such as paying for moving expenses and phone service transfers, public housing residents with disabilities reportedly do not want to relocate. The Dallas Housing Authority, for example, found that even with incentives, only 20 of the 80 persons with disabilities residing in the newly designated elderly-only buildings were willing to use Section 8 certificates. As more PHAs continue to receive their allotments of certificates and vouchers and to educate their residents on how to use them, this situation may change.

At other locations, certificates and vouchers may not be an appropriate option for persons with disabilities because of tight housing markets, rents that are above HUD's fair market rents (FMR), or the prevalence of older housing that has not been adapted to the needs of people with disabilities.<sup>21</sup> For example, because of the high demand for rental housing in the San Francisco market and the ease with which landlords can get rents higher than HUD's FMR, landlords may not be willing to rent to subsidized tenants, especially to persons with disabilities for whom they would have to make accessibility accommodations.<sup>22</sup> HUD's FMR is also an issue in Cambridge, Massachusetts, which recently underwent rent decontrol. The Cambridge Housing Authority used a portion of its Section 8 administrative fees to hire a housing-search worker to help Section 8 recipients find housing. Another PHA we surveyed—in Westbrook, Maine—also cited a tight housing market and a predominance of older, inaccessible housing as obstacles faced by persons with disabilities seeking housing in the private market. Apartments in older buildings usually have small rooms and narrow entrances, making it difficult to improve their accessibility.

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### With Greater Assistance, Those Using Certificates and Vouchers Were Able to Find Housing

Despite the difficulties encountered in some housing markets, when persons with disabilities were offered Section 8 certificates and vouchers, they appeared to be able to use them in most locations. Overall, only about 11 percent of the certificates and vouchers had been turned back to the housing authorities unused as of the time of our survey. Half of the

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<sup>21</sup>Under Section 8, rental assistance payments are limited by the FMR that HUD established for different housing market areas. In general, the FMR for an area is the amount that would be needed to pay the gross rent (shelter plus utilities) of privately owned rental housing of a modest nature that meets HUD's rent requirement and housing quality standards. Specifically, the FMR is set at the 40th percentile of an area's rental housing; that is, the level at which about 40 percent of a market area's rental housing can be obtained.

<sup>22</sup>Under current law, PHAs are required to pay for physical modifications to units or common areas they own if the changes are a reasonable accommodation needed by a tenant with a disability. Private landlords, while required to allow modifications be made to units they own as a reasonable accommodation to a tenant's disability, are not required to pay for the modifications. Generally, the tenant must pay for them. However, HUD regulations allow PHAs to approve rents up to 20 percent above the applicable FMR to pay for the modifications needed to make a unit accessible to a person with disabilities.

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housing authorities reported that the rate at which persons with disabilities turned back certificates and vouchers was about the same as that for recipients without disabilities. Moreover, they said that these users were taking about the same amount of time as the other recipients to find housing. However, the housing authorities reported in our survey that persons with disabilities required greater assistance to locate private housing. In our case study interviews, housing authorities' managers told us that the extra assistance they provided included preparing lists of apartments that accepted Section 8 certificates or vouchers and transportation to the apartments. Where assistance was provided, certificates and vouchers had helped persons with disabilities.

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### Still Too Early to Determine How Successful Certificates and Vouchers Have Been

In our survey, the majority of housing authorities reported that it was still too early to determine how successful certificates and vouchers have been in helping persons with disabilities rent private housing. This observation was affirmed by our case study work. Four of the six housing authorities where we conducted case studies had received certificates or vouchers, but managers there said that it was too early to determine how successful this Section 8 assistance had been in providing housing options. The Housing Authority of Gloucester County, New Jersey, for example, had only recently hired a full-time person to administer the 130 vouchers it received after it identified privately owned projects that had established preferences for the elderly; as of January 1998, it had successfully utilized 10 vouchers to provide housing. Similarly, the Anaheim, California, housing authority had not yet issued any of the 150 vouchers it had received from the mainstream housing program. It expected that all 150 vouchers would be used, however, and planned to apply for more vouchers because it had 1,500 persons with disabilities on its waiting list.

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### Agency Comments

We provided HUD with a draft of this report for review and comment. We met with HUD officials to discuss their comments and our response. Specifically, we met with the following officials from the Office of the Assistant Secretary for Public and Indian Housing: the Senior Director of the Office of the Deputy Assistant Secretary for Policy, Program, and Legislative Initiatives; the Acting Director of Management and Planning; the Senior Program Manager, Real Estate and Housing Performance Division (Section 8); and the Senior Program Analyst, Customer Service and Amenities Division. We also met with officials from the Office of Fair Housing and Equal Opportunity and the Special Assistant to the Secretary

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on Disability Rights. There were four general categories of comments, which are listed below with our response.

Comments on our analysis on the allocation plans: HUD requested that we include the most up-to-date information on the number of PHAS with approved allocation plans and the number of designated units. While we did not obtain survey responses from the PHAS that received approval for their allocation plans after November 1, 1997, we have made note of the most recent data provided by HUD. HUD also believed that our analysis showing that the 24,902 units designated as elderly-only represent 7.5 percent of these PHAS' total units was misleading. HUD said the figure implies that only an insignificant percentage of the available public housing is no longer available to persons with disabilities in communities with approved allocation plans. We have changed the language in the report to reflect that the 24,902 units represent 36 percent of these PHAS' housing stock for the elderly and for persons with disabilities. HUD requested that we include additional information on the statutory requirements of the designated housing law. Where appropriate, we have done so. Finally, we have incorporated HUD's position that the reason designating housing for the elderly has had little impact on housing opportunities for persons with disabilities is that HUD worked closely with these PHAS to ensure that they were able to address the needs of the members of all the groups affected by designations.

Comments on our analysis on Section 8 certificates and vouchers: HUD believed that because of the length of time taken by the submission and approval of applications and by the execution of annual contributions contracts, many PHAS were not in a position to issue the certificates and vouchers they were awarded from either of the two notices of funding availability published in April 1997 until late October or early November. HUD requested that we add language to state that it should not be surprising that only a small percentage of certificates and vouchers had been issued and used by persons with disabilities as of November 1, 1997. We have added, in the appropriate sections of the report, language to acknowledge the time needed for the submission and approval of housing authorities' applications and for the issuance and execution of annual contributions contracts before certificates and vouchers are actually available for use. HUD also suggested that we include the fiscal year 1998 funding of \$48.5 million for the mainstream certificates and vouchers program. We did so. However, we disagree with HUD's suggestion that we delete from our analysis the \$25 million of the fiscal year 1997 appropriations and the \$20 million of the fiscal year 1998 appropriations



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that were directed at assisting nonelderly persons with disabilities affected by elderly preferences established by privately owned projects. We included these amounts because the Congress requested that our analysis include all new Section 8 certificates and vouchers for persons with disabilities.

Comments on our survey instrument: HUD thought that our survey instrument should have included questions pertaining to housing demand, characteristics of persons on public housing waiting lists, and the number of efficiencies and one-bedroom units in family developments. Questions 24, 37, and 38 of the survey instrument asked PHAS to evaluate the impact that designating housing and issuing additional certificates and vouchers have had on their ability to meet the housing needs of persons with disabilities. We expected the PHAS to take demand for housing and the characteristics of the persons on their waiting lists into consideration in their responses to these subjective questions. Public housing waiting lists, we discovered in our pretests, are imperfect measures of demand for housing as they reflect demand only at the time the individual is placed on the waiting list or when the list is updated. Our survey found that 82 percent of the certificates and vouchers were used by persons with disabilities on public housing and/or Section 8 waiting lists. This is consistent with HUD's point that persons on waiting lists are the group most helped by the targeted Section 8 rental assistance. Furthermore, the focus of the survey questions regarding occupancy was on the designated units and the units available to the elderly and persons with disabilities. These questions did not exclude the possibility of such units in family buildings. Finally, we disagree that our question on how many units PHAS had designated for only persons with disabilities did not differentiate between units designated in the allocation plan and physically accessible units that were not designated in the plan. Questions 11 and 12 of the survey used the language "units you designated in your allocation plan as 'disabled-only,'" which we believe is very clear. We had no indication from either our pretests or our callbacks to housing authorities for response clarification that they were incorrectly interpreting these questions.

Comments on our population analysis: HUD believed that we needed to focus more on families with very low incomes (i.e., incomes at or below 50 percent of the median family income for their area) in our analysis, not just low-income families (i.e., those with incomes at or below 80 percent of the median income for their area). HUD stated that families with incomes between 50 and 80 percent of the area's median income qualify for a smaller number of public housing units and generally do not qualify for

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Section 8 rental assistance. We concurred and made appropriate modifications. HUD also pointed out that our estimates of low-income persons with disabilities meeting HUD's definition differ significantly from the conclusion HUD reached in its 1997 report to the Congress on worst-case housing needs.<sup>23</sup> While we used the definition of disability used in HUD's housing programs, HUD, in its report on worst-case housing needs, used a more restrictive definition of disability than it uses in its housing programs.

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We conducted our review from July 1997 through May 1998 in accordance with generally accepted government auditing standards.

We are sending copies of this report to the appropriate Senate and House committees; the Secretaries of HUD and Health and Human Services; and the Director of the Office of Management and Budget. We will make copies available to others on request.

Please call me at (202) 512-7631 if you or your staff have any questions about the material in this report. Major contributors to this report are listed in appendix VI.



Judy A. England-Joseph  
Director, Housing and Community  
Development Issues

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<sup>23</sup>Rental Housing Assistance—The Crisis Continues: The 1997 Report to Congress on Worst Case Housing Needs (April 1998).

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**Abbreviations**

ADL	activity of daily living
ASPE	Office of the Assistant Secretary for Planning and Evaluation
FMR	fair market rents
HHS	Department of Health and Human Services
HUD	Department of Housing and Urban Development
IADL	instrumental activity of daily living
MR/DD	mental retardation or other developmental disabilities
NHIS	National Health Interview Survey
PHA	public housing authority
SSI	Supplemental Security Income
TVRHA	Tennessee Valley Regional Housing Authority
USDA	U.S. Department of Agriculture
VA	Department of Veterans Affairs

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# Population of Low-Income Persons With Disabilities Meeting HUD's Definition Is an Estimated 9 Million Nationally

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To estimate the number of households in which the head of the household or spouse meets the Department of Housing and Urban Development's (HUD) definition of a low-income person with a disability, we used data from the National Health Interview Survey (NHIS) conducted for the Department of Health and Human Services' (HHS) National Center for Health Statistics. We worked with HHS' Office of the Assistant Secretary for Planning and Evaluation (ASPE) and the Special Assistant to the Secretary in HUD's Office of Disability Policy to develop criteria for using data about income, age, and disabilities from the 1994 survey. HHS then applied these criteria to estimate the number of noninstitutionalized households in which the head of the household or spouse—or the sole person in the case of a single-person household—would be considered under HUD's definition to be a person with a disability.

NHIS, which was first conducted in 1957, is a continuing national survey of civilian, noninstitutionalized households. It is the principal source of information on the health of this population. In addition to the basic survey, NHIS in many years includes supplements covering special topics. For 1994, NHIS covered five special topics, including disability and family resources—both of which were used in the estimates of households meeting HUD's definition of persons with disabilities.<sup>24</sup>

Because NHIS estimates are based on a sample of households, they may differ somewhat from the figures that would have been obtained from a complete census. In 1994, 45,705 households were interviewed, resulting in a sample of 116,179 persons.<sup>25</sup> Since NHIS's design is a complex multistage probability sample, the estimates provided do have sampling errors; however, HHS did not compute the sampling errors for each estimate. Where we could identify similar estimates published by others, we found that HHS' estimates were generally in the same range. We did not perform a technical review of HHS' programming.

NHIS excludes members of the armed forces, U.S. nationals living abroad, nursing home residents, and institutionalized persons. According to the 1990 census, 3.3 million Americans lived in institutions,<sup>26</sup> including

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<sup>24</sup>The NHIS Disability Supplement was administered in 1994 and 1995. In each year, a Phase I screening interview was conducted to identify persons with disabilities. Persons who screened in as having a disability subsequently received a second, more detailed Phase II interview. The data on which the analyses in this appendix are based come from the 1994 (first year) Phase I interviews.

<sup>25</sup>NHIS has a very high response rate. Of the 48,584 households eligible to be interviewed in the 1994 survey, 2,879—or about 6 percent—were not included either because they refused to respond or were not located.

<sup>26</sup>An institution is a group quarters in which some residents are not free to leave without permission.



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1.8 million persons in nursing homes.<sup>27</sup> An additional 340,000 persons lived in other types of institutions, such as psychiatric hospitals and schools, hospitals, or wards for the mentally retarded. Some portion of the 340,000 persons in such institutions, as well as those in nursing homes, might be expected to have conditions that substantially impair their ability to live independently, according to HUD officials. However, these persons are not included in the estimates presented here of the population meeting HUD's definition for persons with disabilities. The remaining persons in institutions include 1.1 million persons in correctional institutions and 104,200 in juvenile institutions.

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## **HUD's Definition of Low-Income Persons With Disabilities**

Low-income and very low-income families are eligible for housing assistance under HUD's public and assisted housing programs. Generally, low-income families are those with adjusted incomes at or below 80 percent of the median income in their areas, as determined by HUD with adjustments for smaller and larger families. Very low-income families are those with adjusted incomes at or below 50 percent of their areas' median income. Very low-income families qualify for public housing and Section 8 rental assistance. Families with incomes between 50 and 80 percent of their area's median income, however, are eligible for HUD's public housing programs but generally compete for a smaller number of units, and most do not qualify for Section 8 rental assistance.

HUD's public and assisted housing programs use a definition of disability that includes a measure of functional limitation that is due to a medical condition of a certain duration. Specifically, the programs generally consider a person to have a disability if that person (1) meets the definition used under section 223 of the Social Security Act; or (2) meets the definition for developmental disabilities found in the Developmental Disabilities Assistance and Bill of Rights Act; or (3) has a physical, mental, or emotional condition that is expected to be of long-continued and indefinite duration, substantially impedes the person's ability to live independently, and is of such nature that the person's ability to live independently could be improved by more suitable housing conditions.

A low-income or very low-income family whose household head or spouse meets HUD's definition of a person with a disability is ordinarily eligible for housing units available to the elderly, even though the household head or

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<sup>27</sup>According to the 1995 National Nursing Home Survey, about 1.5 million persons received care in nursing homes in 1995. Nearly 90 percent of these residents were 65 and over, according to the National Center for Health Statistics. Of all persons 65 and over, about 4 percent were living in nursing homes in 1995.

spouse may not be elderly.<sup>28</sup> However, the Housing and Community Development Act of 1992 allows public housing authorities (PHA) that have approved allocation plans and owners of certain HUD-assisted projects to restrict occupancy in particular units to the elderly only.

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## Applying HUD's Definition to the NHIS Data

To identify low-income and very low-income families, we asked that HHS compare total household income—excluding income from persons under the age of 18—recorded in the NHIS data with HUD's 1994 adjusted median family income for metro and nonmetro areas within the four census regions, adjusted for family size.<sup>29</sup> HHS summarized responses to questions in the family resources supplement of NHIS on components of household income for adult family members—in the case of families—and for the sole person in single-person households. For NHIS, all persons in a household related to each other by blood, marriage, or adoption constitute a family.<sup>30</sup> For about 16 percent of the households, there were no income data; these households were excluded from the estimates provided here. We do not know how the income of those households compared with the income of households for which the data were available.

To identify households in which the household head or spouse (or the sole person in the case of a single-person household) was a person with a disability as defined by HUD, we utilized responses to questions about the receipt of Supplemental Security Income (SSI);<sup>31</sup> any conditions associated with developmental disabilities; the presence of physical, mental, and emotional conditions; the duration of the condition; and the difficulty experienced with activities of daily living (ADL) and instrumental activities of daily living (IADL).<sup>32</sup> Specifically, we estimated the number of

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<sup>28</sup>For single-person families, the sole member would need to meet HUD's definition of a person with a disability.

<sup>29</sup>For HUD's public and assisted housing programs, family income is compared with the adjusted median family income for the area in which the family lives. However, for income data, NHIS may only identify the census region in which the family lives and whether the family lives in a metropolitan statistical area. In addition, while HUD allows other exclusions of income, the only income excluded from the analysis is that from members of the family younger than 18.

<sup>30</sup>Additional groups of people living in the household are considered secondary families, and, along with secondary individuals, are excluded from the estimates provided here. Of the approximate 116,000 unweighted observations in the survey, about 102,000 were primary families, 12,500 primary individuals, 180 secondary families, and 1,300 secondary individuals.

<sup>31</sup>The Social Security Administration's SSI program provides means-tested assistance to needy aged, blind, or disabled people.

<sup>32</sup>ADLs included bathing or showering; dressing; eating; getting in or out of bed or chairs; using the toilet, including getting to the toilet; and getting around inside the home. IADLs included preparing meals, shopping, managing money, using the telephone, heavy housework, and light housework.

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households in which the household head or spouse or sole individual (1) received ssi; (2) met the definition of disability under the Developmental Disabilities Assistance and Bill of Rights Act;<sup>33</sup> (3) had—without the use of equipment, help, or supervision—a lot of difficulty with or was unable to perform one or more ADL or IADL because of a physical, mental, or emotional condition expected to last another 12 months; or (4) had a mental or emotional condition that seriously interfered with his or her ability to work, attend school, or manage day-to-day activities without regard to the duration of this condition.<sup>34</sup> We did not attempt to determine if the person's ability to live independently could have been improved by more suitable housing conditions. Also, we did not attempt to determine the person's housing needs or whether a person was currently residing in public or assisted housing.

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## Results of the Analysis

According to the estimates provided by HHS, in 1994 about 9 million low-income households (including about 7 million very low-income households) not living in institutions had as a household head or spouse a person who may have met HUD's definition of a person with a disability. In almost half of these households, the household head or spouse was a nonelderly adult with a disability.<sup>35</sup> There were an estimated 2.5 million low-income renter households that had as a household head or spouse a nonelderly person with a disability.

The overall estimates provided by HHS were within the range of other estimates of the number of persons with disabilities. Specifically, when not considering income, HHS estimated that there were about 11 million households—or almost 14 percent of all households—that had as a household head or spouse a person who met HUD's definition of a person with a disability. In comparison, a 1996 study estimated that for about 17 million families—or about 24 percent of all families in the 1990

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<sup>33</sup>ASPE has used the NHIS data for estimating persons with mental retardation or other developmental disabilities (MR/DD). Based on statutory language, the following criteria were applied: (1) a reported condition commonly resulting in MR/DD (e.g., mental retardation, cerebral palsy, Down's syndrome); or (2) problems with one or more of three major life activities, namely self-care, self-determination, and mobility (as measured by ADL or IADL status); or (3) serious difficulty with learning; or (4) serious difficulty with communicating or understanding other people (apart from language problems); or (5) use of services typically used by persons with MR/DD, such as sheltered workshops, transitional work training, or supported employment. Respondents were considered to have MR/DD if their responses (or the responses of proxies) to questions indicated that they met any of these criteria with an age of onset prior to age 22.

<sup>34</sup>Persons who did not use special equipment or need help or supervision, but had a lot of difficulty or were unable to perform one or more of the ADLs or IADLs, were included, as were persons who used special equipment or needed help or supervision from others and, without such equipment or help, would have a lot of difficulty or would have been unable to perform one or more of the ADLs or IADLs.

<sup>35</sup>Nonelderly adults are individuals aged 18 to 61.

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NHIS—the household head, or in the case of “partnered families” one or both partners, had a disability.<sup>36</sup> A study using data from the 1992 Survey of Income and Program Participation estimated that about 48.9 million noninstitutionalized civilians—or about 19.4 percent of this population—had a disability.<sup>37</sup> Of these, about half had a severe disability. Considering that in 1992, households had an average of 2.62 persons, the number of households with a member that had a disability would have been about 19 million, and the number of households with a member that had a severe disability would have been about 9 million. According to the 1990 census, about 22 million noninstitutionalized persons aged 16 and older had a work disability, a mobility limitation, or a self-care limitation. This may equate to about 8.5 million such households.

Of the HHS-estimated 46.3 million low-income households, 8.7 million, or about 19 percent, were households that were headed by persons or spouses with disabilities and that had incomes at or below 80 percent of HUD's adjusted median family income. Of that 8.7 million households, 6.6 million had incomes at or below 50 percent of HUD's adjusted median family income. A low-income household was more likely than other households to have a person with a disability as a household head or spouse. About half of these households had as a household head or spouse a person with a disability who was younger than age 62. Elderly households represented about 51 percent of the low-income households headed by a person or a spouse with a disability. However, elderly households were twice as likely as younger households to have a household head or spouse with a disability. That is, while 28 percent of low-income elderly households had as a household head or spouse a person with a disability, the figure was 14 percent for younger low-income households. About 45 percent of the low-income households headed by a person or a spouse with a disability rented, rather than owned, their homes. Table I.1 shows the estimated income and disability status of the households included in the 1994 NHIS.

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<sup>36</sup>Partnered families are those headed by a couple, whether married or not. The 1996 study defined disability for nonelderly adults as the inability to work at a job or keep house, or limitations in the ability to perform the amount or kind of these and other activities. See Mitchell LaPlante, Dawn Carlson, and others, *Disability Statistics Report: Families With Disabilities in the United States*, prepared for the National Institute on Disability and Rehabilitation Research, U.S. Department of Education (Washington, D.C.: U.S. Department of Education, Sept. 1996).

<sup>37</sup>Lewis Kraus, Susan Stoddard, and David Gilmartin, *Chartbook on Disability in the United States, 1996*, prepared for the National Institute on Disability and Rehabilitation Research, U.S. Department of Education (Washington, D.C.: U.S. Department of Education, 1996).

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**Table I.1: Estimated Income and Disability Status of Households**

Millions

Household head or spouse <sup>a</sup>	All households			Low-income households <sup>b</sup>			Very low-income households <sup>c</sup>		
	All <sup>d</sup>	Renter	Owner	All <sup>d</sup>	Renter	Owner	All <sup>d</sup>	Renter	Owner
All	81.5	27.6	51.1	46.3	19.7	24.5	30.5	14.2	14.6
Person with a disability	11.1	4.3	6.2	8.7	3.9	4.3	6.6	3.3	2.9
Elderly <sup>e</sup>	20.9	4.2	16.0	15.9	3.7	11.5	11.0	3.1	7.4
Elderly person with a disability	5.1	1.5	3.4	4.4	1.4	2.7	3.3	1.3	1.9
Nonelderly <sup>f</sup>	60.6	23.4	35.0	30.4	15.9	13.0	19.5	11.1	7.2
Nonelderly person with a disability	6.0	2.9	2.8	4.3	2.5	1.6	3.3	2.1	1.0

Note: About 16 percent of all households were excluded because income data were not available.

<sup>a</sup>Sole person in the case of single-person households. Does not include secondary families and individuals.

<sup>b</sup>Income at or below 80 percent of HUD's adjusted median family income for the metro or nonmetro area and census region in which the household lived, adjusted for family size.

<sup>c</sup>Income at or below 50 percent of HUD's adjusted median family income for the metro or nonmetro area and census region in which the household lived, adjusted for family size.

<sup>d</sup>Includes households that were renters or owners as well as households that were neither.

<sup>e</sup>Head of household or spouse was aged 62 and older.

<sup>f</sup>Head of household or spouse was aged 18 to 61.

Source: HHS analysis of data from the 1994 National Health Interview Survey, Disability Supplement (Phase I) and Family Resources Supplement.

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# Objectives, Scope, and Methodology

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The Subcommittee on VA, HUD, and Independent Agencies of the House Committee on Appropriations asked us to assess (1) the impact of the Housing and Community Development Act of 1992 on the availability of public housing for persons with disabilities and (2) how incremental Section 8 certificates and vouchers that were made available since the passage of the 1992 act were assisting persons with disabilities seeking affordable rental housing.<sup>38</sup> As requested, we also developed estimates of the number of households that may meet HUD's definition of persons with disabilities.

To obtain information for this report, we conducted a survey of the 73 PHAS that, according to HUD, had approved allocation plans as of November 1, 1997. In addition, we sent the survey to 23 other housing authorities that did not have approved allocation plans but had been awarded Section 8 certificates and vouchers for the exclusive use of persons with disabilities as of November 1, 1997. We mailed a questionnaire to each of these 96 housing authorities and made follow-up calls as needed to stimulate responses or verify unclear answers. All 96 housing authorities responded to the survey. The results of the survey are summarized in appendix IV.

To supplement the results of the survey, we conducted six case studies at housing authorities and their immediate communities in (1) Fall River, Massachusetts; (2) Dallas, Texas; (3) Corinth, Mississippi; (4) Gloucester County, New Jersey; (5) Anaheim, California; and (6) San Francisco, California. We neither evaluated these housing authorities' provision of affordable housing for persons with disabilities nor compared one authority's efforts with those of another. Rather, our aim was to provide a comprehensive picture of housing authorities facing different challenges in providing housing for persons with disabilities. Our criteria for selecting the locations included the following:

- Size of the housing authority—Our case studies included large and small housing authorities.
- Size of the housing authority's community—Our case studies included large cities, suburban communities, and a rural community.
- Condition of the housing market—Our case studies ranged from a city with a housing market known to be particularly tight to a community with a surplus of affordable housing.
- Designated housing and Section 8 assistance—Of the six locations, three PHAS had allocation plans for designated public housing and Section 8

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<sup>38</sup>The Subcommittee also requested that we assess the impact of the 1992 act on the availability of privately owned, HUD-subsidized rental housing for low-income persons with disabilities. We will issue a separate report on those findings.

certificates and vouchers; two housing authorities had no designated public housing but received certificates and vouchers (one was a housing authority that had no public housing units but administered Section 8 assistance); and one PHA neither had an allocation plan nor received certificates or vouchers for the exclusive use of persons with disabilities.

We visited these six locations and interviewed the local housing authority officials about their experience in housing persons with disabilities. We also interviewed representatives of a judgmentally selected number of HUD-subsidized, privately owned projects that provided housing for the elderly and persons with disabilities to determine whether they established preferences for the elderly. Finally, we spoke with advocates for both the elderly and persons with disabilities in the communities we studied, where we were able to identify them. See appendix III for detailed information about the six case studies.

To conduct the analysis of the population of low-income persons with disabilities, we asked the Department of Health and Human Services' Office of the Assistant Secretary for Planning and Evaluation (ASPE) to conduct population analyses of data from the agency's National Health Interview Survey, using HUD's definition of low-income persons with disabilities as parameters. Bob Clark, Senior Program Analyst, and Don Chontos, Programmer, of ASPE developed the analysis. See appendix I for information on the population analysis.

Finally, we reviewed the legislative history of the provisions in the 1992 act that allowed housing authorities to seek approval from HUD to designate housing for the elderly, persons with disabilities, or both and the appropriations set-asides for Section 8 certificates and vouchers in fiscal years 1997 and 1998. We interviewed appropriate HUD officials about designated housing, other housing for the elderly and persons with disabilities, and Section 8 certificates and vouchers (see app. V for a discussion on Section 8 certificates and vouchers). We also interviewed representatives of the national associations for persons with disabilities and the elderly. We conducted our review from July 1997 through May 1998 in accordance with generally accepted government auditing standards.

# Case Studies: Impact on Persons With Disabilities at Six Housing Authorities

To better describe the impact of the Housing and Community Development Act of 1992 on the availability of housing for persons with disabilities, we visited six locations. Three of the six have housing authorities with approved allocation plans, and two of these also have Section 8 certificates for persons with disabilities. Two other authorities in our case study do not have allocation plans but received vouchers. We selected the final location to review the practicality of certificates and vouchers for persons with disabilities in an extremely tight housing market. Table III.1 shows the six housing authorities we visited.

**Table III.1: Summary of Case Studies**

Location	Year allocation plan approved	Public housing units <sup>a</sup>	Section 8 certificates/vouchers	
			For persons with disabilities	Total for all families
Fall River, MA	1996	1,707	76 <sup>b</sup>	2,181
Dallas, TX	1995	4,647	80 <sup>b</sup>	9,182
Corinth, MS	1995	343	0	168
Gloucester County, NJ	None	262	130 <sup>c</sup>	1,615
Anaheim, CA	None	0	100 <sup>c</sup>	3,390
San Francisco, CA	None	6,722	0	4,945

<sup>a</sup>Includes federally supported public housing units only.

<sup>b</sup>Certificates.

<sup>c</sup>Vouchers.

Five of the six locations we visited have housing authorities that manage public housing units. Officials from all five told us that mixing elderly and nonelderly persons with disabilities in the same buildings does not always work well. In some cases it was the lifestyles associated with youth, not necessarily disability, that caused the underlying problems, and in other cases, it was younger persons with mental disabilities and their friends and visitors who caused problems for the elderly.<sup>39</sup>

All three housing authorities with allocation plans—Fall River, Dallas, and the Tennessee Valley Regional Housing Authority (TVRHA) in Corinth—designated entire buildings for the elderly. The Fall River

<sup>39</sup>In 1992, we reported that, in some cases, younger persons with mental disabilities caused moderate or serious problems, such as threatening other tenants and having disruptive visitors, and that the number of these nonelderly persons with disabilities living in public housing for the elderly was increasing. See *Public Housing: Housing Persons With Mental Disabilities With the Elderly* (GAO/RCED-92-81, Aug. 12, 1992).



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authority designated six of its federally aided elderly/disabled buildings as elderly-only. It also has one building primarily for younger persons with disabilities, but officials there said they will accept elderly applicants for these units as well. The Dallas Housing Authority designated two of its four elderly/disabled buildings as elderly-only. The other two buildings are for mixed elderly/disabled occupancy. TVRHA in Corinth designated its one high-rise elderly/disabled building for the elderly and near-elderly.

HUD awarded Section 8 certificates for those younger persons with disabilities in Dallas who wanted to move out of the buildings designated for the elderly into privately owned rental units in the community. HUD also required the Fall River Housing Authority to offer certain certificates it had been awarded previously to younger persons with disabilities. TVRHA officials told us that they had not requested additional certificates or vouchers for persons with disabilities because there was no need for them. The authority had no elderly or persons with disabilities on its waiting list. Officials at all three housing authorities stated that the elderly and persons with disabilities may apply for appropriately sized units in any of the other buildings the authorities manage. TVRHA reported that elderly and persons with disabilities constitute over two-thirds of their public housing residents. Housing authority officials in Fall River said they constitute almost 39 percent.

Table III.2 shows the number of units designated for the elderly and for persons with disabilities as a result of the allocation plans, and also shows the number of units that are not designated but are considered elderly/disabled units.

**Table III.2: Federally Funded Public Housing Units for Elderly and Persons With Disabilities**

<b>Location</b>	<b>Total units</b>	<b>Designated as elderly-only</b>	<b>Intended primarily for nonelderly disabled</b>	<b>Undesignated but elderly/disabled</b>
Fall River, MA	1,707	637	208	N/A
Dallas, TX	4,647	319	N/A	407
Corinth, MS	343	50	N/A	N/A

Note: N/A means not applicable.

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## Impact of the Allocation Plans and Certificates and Vouchers

The impact of the allocation plans on affordable housing for persons with disabilities was minimal, at the time of our visits. Occupancy in the buildings designated for the elderly had not changed substantially since the housing authorities submitted their allocation plans, and where certificates and vouchers had been made available, persons with disabilities on waiting lists were able to use them to find housing. TVRHA allowed near-elderly persons with disabilities—those between the ages of 50 and 62—to move into its elderly-only building. Most of the persons with disabilities living in the units designated for the elderly in Fall River and Dallas chose to remain there rather than use the Section 8 certificates allocated for them, according to housing authority officials. In Fall River, where 76 certificates had been set aside for the 77 persons with disabilities occupying units in elderly-only buildings, 22 chose to use a certificate to move. In Dallas, which had 80 certificates allotted, 20 tenants used them. As for the remaining certificates, the Fall River authority offered them to younger persons with disabilities on its other waiting lists, and all have been used. Dallas officials intend to offer them to people from other developments but, at the time of our visit, had not yet made them available. They also told us that 49 additional persons with disabilities had requested the certificates but had subsequently returned them to the authority unused. The officials said they believed these residents decided to stay in their current units because they felt comfortable there, but we did not verify this assertion.

Most of the advocates for persons with disabilities we spoke with told us that their clients should be able to choose to live wherever they want. Some prefer to live independently, and some like the security and amenities offered in buildings designed for the elderly. An advocate in Fall River did not consider the building reserved for persons with disabilities an attractive alternative and told us that the trend now is for this population to live in the community and arrange for support services of their own choosing. Similarly, some advocates for the elderly told us that the elderly should have choices and that they prefer to live among other elderly and not among younger people.

Officials at all three housing authorities with approved allocation plans told us that the length of time the elderly and persons with disabilities remain on the waiting list is about the same as it was prior to the allocation plans. They said that the average time an applicant remains on the waiting list is between 60 to 90 days in Dallas, about 2 to 3 months in Fall River, and about 30 days in Corinth.

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## **Impact of Certificates and Vouchers Where There Were No Allocation Plans**

While three of the six authorities we visited—Gloucester County, Anaheim, and San Francisco—do not have allocation plans, housing authorities in Gloucester County and Anaheim received vouchers for nonelderly persons with disabilities.<sup>40</sup> The San Francisco housing authority had neither an allocation plan nor special certificates or vouchers for persons with disabilities at the time of our visit, but said it had considered the issue in the past and is likely to submit an allocation plan at some future point. The housing authorities in Gloucester County and Anaheim requested vouchers for persons with disabilities on their waiting lists, but for different reasons. The Housing Authority of Gloucester County manages a Section 8 project that it designated as elderly-only in 1993 because the project was originally built for the elderly. To offset the loss of units to persons with disabilities in this building, the housing authority applied for 130 vouchers—roughly enough to handle all persons with disabilities on its waiting lists. The Anaheim Housing Authority manages no public housing units, so it will use its 100 vouchers for persons with disabilities on its Section 8 waiting list.

At the time of our visits, it was too early to determine the impact of these additional vouchers on affordable housing for persons with disabilities, as neither housing authority had been able to issue them all, officials there said. HUD awarded funding for Gloucester County's vouchers in September 1997. Officials from the authority said they then hired and trained a staff person to assist persons with disabilities. As of January 1998, the authority had interviewed 80 applicants, had successfully utilized 10 vouchers to provide housing, and hoped to utilize 30 more by February 1.

Officials from the Anaheim Housing Authority said they had not issued any vouchers at the time of our visit because funding had been awarded only recently. They said they expected all the vouchers to be used and planned to apply for more in the future because of the demand. They also said that with existing Section 8 certificates and vouchers, persons with disabilities and the elderly have been relatively easy to place compared with low-income families because they are less transient than the families that apply for assistance. The only difficulty the officials anticipated was in placing persons with mental disabilities. But, according to its voucher application, the authority plans to help individuals using these vouchers find housing and also work with local agencies to provide additional support services to these tenants.

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<sup>40</sup>The Housing Authority of Gloucester County submitted an allocation plan, but HUD denied approval. The authority plans to modify and resubmit the plan.

Officials from the San Francisco Housing Authority told us that the use of certificates and vouchers by persons with or without disabilities has been problematic because of the tight housing market there. Rents are very high and usually exceed what a certificate or voucher will cover, making it difficult to find an appropriate apartment using a Section 8 certificate or voucher, they said. Moreover, they have not opened their Section 8 waiting list since 1986, when about 10,000 households applied.

An official from the Housing Authority of Gloucester County said that persons with disabilities who apply for certificates or vouchers return them unused at about the same rate as other people. Anaheim authority officials told us that they usually do not have problems placing the elderly or persons with disabilities. However, a San Francisco Housing Authority official said persons with disabilities often have special problems using the certificates or vouchers in that area because apartments are scarce, the process of looking for an apartment is challenging in the hilly city, and discrimination against persons with physical and mental disabilities is believed to be pervasive. In Gloucester County and Anaheim, housing authority officials said that for every three Section 8 certificates or vouchers issued, two are returned and one is used. Gloucester County attributed this high turnback rate, in some cases, to applicants being unable to afford the security deposits or utility bills. They also said that some persons with disabilities who live with their families do not want to move away from home, but take a certificate or voucher to please their families and then return it unused.

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## **Fall River Housing Authority**

Fall River is a city of about 91,000 located in the southeastern corner of Massachusetts. The Fall River Housing Authority's allocation plan, approved in February 1996, designated six public housing buildings for the elderly, with a seventh building primarily serving younger persons with disabilities. When the plan was approved, HUD required the authority to offer Section 8 certificates exclusively to persons with disabilities to compensate for the housing units designated elderly-only.

Fall River has a relatively depressed economy. Although vacancy rates in the private housing market are relatively high and rents are relatively low, the area's high unemployment rate and low income levels mean that many households still pay a large proportion of their income in rent, putting Section 8 certificates and vouchers in high demand. When the waiting list for Section 8 assistance was last opened in September 1997, over 1,100 people applied in a single day. Because vacancy rates are high and

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landlords generally welcome Section 8 tenants, there is little difficulty with using certificates or vouchers. The housing authority administers 2,181 certificates and vouchers.

Fall River has a surplus of public housing, with more than 2,500 public housing units in buildings funded by the federal or state government and nearly 1,700 units in private developments subsidized by the federal or state government. The overall vacancy rate is 9 percent, and waiting times for public housing are short—usually 2 to 3 months—for those who are willing to take the first available unit in any building. The housing authority has recently begun a marketing effort to attract more applicants to public housing. Table III.3 shows the types of public and assisted housing in the community.

**Table III.3: Public and Assisted Housing in Fall River**

<b>Type of units</b>	<b>Total units</b>
Public housing, federally funded	1,707
Public housing, state-funded	849
Section 8 certificates and vouchers	2,181
Private developments, federal or state subsidies	1,698 <sup>a</sup>
<b>Total</b>	<b>6,435</b>

<sup>a</sup>There are 13 private housing developments, 10 of which are administered by the Massachusetts Housing Finance Agency.

Sources: Fall River Housing Authority and HUD.

The housing authority’s allocation plan designated six of its seven federally aided elderly/disabled projects as elderly-only. At the time the plan was approved, 77 younger persons with disabilities lived in those projects. A seventh project, Cardinal Medeiros Towers, remained categorized as elderly/disabled, primarily serving persons with disabilities under the age of 62. A survey by the housing authority found that of the younger persons with disabilities living in the buildings designated elderly-only, 56 percent had physical disabilities and 44 percent had mental disabilities, which included mental illness, retardation, and substance abuse.

Officials at the authority said that they decided to submit an allocation plan because of complaints from elderly residents that many of the younger residents played loud music, had undesirable visitors at all hours of the night, or behaved in a generally threatening or disruptive manner.

Officials at the authority and an advocate for the elderly said that active hostility between the elderly and the younger residents with disabilities ran both ways, resulting in a tense living environment. They also said that the issue was one of age and not disability.

None of the 77 younger persons with disabilities occupying units in elderly-only buildings was forced to move. The authority said it offered each a Section 8 certificate or the opportunity to move to other public housing units, including Cardinal Medeiros Towers, and also offered staff assistance and money to help with the move. Twenty-two of the 77 had moved out of the elderly-only buildings by November 1997, most using Section 8 certificates. Housing authority staff said that it has not been difficult for persons with disabilities to find appropriate apartments in Fall River using the certificates. The rest of the certificates were used by persons with disabilities who had been on the waiting lists for public housing or for Section 8 assistance.

Elderly residents are very happy with the results of the allocation plan, according to housing authority officials, who also said that there have been no complaints from younger persons with disabilities. We spoke with a representative of an advocacy group for persons with disabilities who said she was concerned that the allocation plan did not do enough to ensure the availability of accessible housing for persons with physical disabilities. She also did not consider the one federal public housing option left open to younger persons with disabilities, Cardinal Medeiros Towers, to be an attractive alternative.

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## Dallas Housing Authority

Dallas is the eighth largest city in the United States, with a population of more than 1 million people. In January 1995, the Dallas Housing Authority submitted an allocation plan to designate two of its four elderly/disabled buildings as elderly-only. HUD did not respond within the 90 days established by law, so the plan was approved by default.<sup>41</sup> To provide an opportunity for persons with disabilities living in designated housing to move into the community, the housing authority requested and received 80 Section 8 certificates.

Dallas has a tight rental market, with a vacancy rate around 5.5 percent and an estimated average rental cost of \$696 for a two-bedroom unit. About 46 percent of low- and moderate-income households pay more than

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<sup>41</sup>The Housing Opportunity Program Extension Act of 1996, among other things, shortened the time HUD has to notify public housing authorities of its approval or disapproval of the allocation plans they submit from 90 to 60 days.

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30 percent of their income for rent, and that figure rises to about 72 percent among those with very low incomes, according to HUD data.

As of January 1998, 726 of the housing authority's 4,647 public housing units in four developments were designated for the elderly only or for the elderly/disabled (mixed housing). The authority owns another four buildings with a total of 572 units that receive project-based Section 8 assistance and that are reserved for residents who are elderly or have disabilities. The authority also administers funds to pay for 30 Section 8 units in a property run by the Deaf Action Center. Table III.4 shows the number of HUD-assisted housing units available.

**Table III.4: HUD-Assisted Housing in the City of Dallas**

<b>Type of units</b>	<b>Number of units</b>
Public housing	4,647
Assisted housing	18,682
Section 8 certificates/vouchers	9,182
<b>Total</b>	<b>32,511</b>

Sources: The Dallas Housing Authority and HUD.

The authority developed its allocation plan because concerns arose about mixing elderly residents and younger people with disabilities. Staff told us that some of the elderly residents at the mixed developments had raised noise and security issues. In addition, a resident survey indicated strong support for elderly-only housing.

The impact of the housing authority's allocation plan on persons with disabilities has been minimal thus far. Occupancy in the two buildings designated as elderly-only remained generally the same before and after the designation. The two developments designated, Audelia Manor and Park Manor, had been mixed elderly/disabled housing and had a total of 319 units.

The authority requested and received 80 certificates to assist the younger tenants with disabilities expected to move out of the designated units. The authority also provided incentives, offering to pay for moving expenses, moving supplies, and telephone reconnection fees, but did not require anyone to move. At the time of our visit, 20 of the younger tenants with disabilities in the designated developments had used certificates to rent apartments in the private sector. Another 49 had requested certificates but returned them unused. Authority staff told us that many of these residents

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were reluctant to leave the security of their surroundings. Most still reside in the buildings. The housing authority received permission from HUD to offer the remaining certificates to people with disabilities residing at other developments and, as of April 1998, were offering them to residents at Forest Green and Lakeland Manor.

To assist the residents with disabilities eligible for the 80 certificates, the Dallas Housing Authority generally used its regular Section 8 program to locate housing in the community. Under this program, the authority provides lists of landlords willing to rent to Section 8 tenants and takes prospective Section 8 families on van tours to properties that will accept certificates.<sup>42</sup> To further assist the residents moving out of the developments newly designated for the elderly, the housing authority contacted local landlords to find those willing to rent to people with disabilities. Housing authority staff told us that landlords were typically more willing to accept Section 8 individuals who were physically disabled than they were to accept families receiving Section 8 assistance. Advocates for people with disabilities in Dallas said that the housing issues their clients face are usually related to accessibility rather than to the availability of assisted housing.

Although the allocation plan did not result in as many of the younger residents with disabilities moving out of the buildings designated for the elderly as the housing authority had anticipated, officials said complaints from elderly residents had declined even though occupancy had not changed dramatically.

Designating housing for the elderly has not affected waiting time for units. The waiting time for those needing an elderly/disabled unit is about 60 to 90 days, though the wait may be as long as 6 months if the applicant needs a studio or an accessible unit. This contrasts with an average waiting time of about 60 days for a regular public housing unit. The longer wait for elderly/disabled units stems from the lesser availability of those units, however, not from the impact of the allocation plan.

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<sup>42</sup>The housing authority is currently operating under a remedial order that resulted from the settlement of a lawsuit that alleged discriminatory practices, according to officials of the authority. The settlement required the authority to implement a mobility program to, among other things, assist its Section 8 families in locating housing in areas of Dallas that are not impoverished.



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## Tennessee Valley Regional Housing Authority

Corinth is a city with a population of fewer than 12,000 in Alcorn County in northeastern Mississippi. Public housing is administered by both the Housing Authority of the City of Corinth and the Tennessee Valley Regional Housing Authority (TVRHA), which serves Alcorn and nine other counties. TVRHA also administers Section 8 certificates and vouchers for its 10-county area. In 1995, TVRHA submitted an allocation plan to designate all 50 units in the development in Corinth known as Fort Robinett Manor as elderly-only. HUD approved the plan on March 30, 1995. TVRHA designated Fort Robinett for elderly residents because 96 percent of its units were occupied by the elderly and the development has amenities ideally suited for the elderly. TVRHA officials also told us that mixing elderly and younger persons with disabilities is not always a good idea. TVRHA has not requested Section 8 certificates or vouchers for the exclusive use of persons with disabilities but administers 168 regular certificates and vouchers in Alcorn County. Corinth has 673 units of public housing, managed by two housing authorities. About 66 percent of the units are occupied by either elderly tenants or persons with disabilities, according to the two authorities. Housing authority officials and managers of private projects said that subsidized housing units are overabundant in Corinth, and managers are concerned about a high vacancy rate of around 11 percent. Corinth has more subsidized housing for its population than any place else in the world, according to an official from the city's housing authority. The fair market rent for a one-bedroom unit is \$290 per month; most units administered by TVRHA rent for \$77 plus utilities. Table III.5 shows the categories of public and assisted housing in Corinth.

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**Table III.5: Public and Assisted  
Housing in Corinth**

<b>Type of units</b>	<b>Number of units</b>
Public housing, TVRHA	343 <sup>a</sup>
City of Corinth public housing	330
Section 8 certificates, TVRHA (Alcorn County-wide)	150 <sup>b</sup>
Section 8 vouchers, TVRHA (Alcorn County-wide)	18
HUD assisted housing	40
Rural rental housing, USDA	235 <sup>c</sup>
<b>Total</b>	<b>1,116</b>

<sup>a</sup>TVRHA administers HUD programs in 10 counties, which include 1,214 units of public housing. All of TVRHA's 343 public housing units in Alcorn County are located in Corinth.

<sup>b</sup>TVRHA reported that it actually has 164 certificates in use because the certificates are portable, and it was able to use excess funds from the Housing Assistance Payments Contract for this purpose.

<sup>c</sup>The U.S. Department of Agriculture's (USDA) Rural Development provides subsidized rental units in Corinth.

Sources: TVRHA, the Housing Authority of the City of Corinth, HUD, and the USDA Rural Development.

The impact of TVRHA's allocation plan on housing opportunities for public housing residents with disabilities appears to have been insignificant thus far. At Fort Robinett, occupancy had remained nearly the same. At the time the allocation plan was submitted, 49 of the 50 units were occupied by elderly households. As of November 1, 1997, 44 units were occupied by elderly households, 3 by near-elderly persons with disabilities, and 2 by near-elderly persons without disabilities, for a total of 49 occupied units. When selecting applicants for handicapped-accessible units, TVRHA gives priority to families that include disabled persons who can benefit from those features.

TVRHA officials told us they had not requested additional Section 8 certificates and vouchers to offset the impact of designating housing for the elderly because there were no persons with disabilities on the authority's waiting list. In addition to the handicapped units at Fort Robinett, TVRHA has converted 17 more units for persons with disabilities in Corinth—10 are wheelchair-accessible and 7 are for those who have visual or hearing impairments. Authority officials said that these additional units, along with the normal turnover rate, provide sufficient housing for the younger persons with disabilities who are no longer eligible to live at Fort Robinett. Moreover, the allocation plan states that if any of the

designated units are vacant for over 60 days, they will be made available to younger applicants.

For Section 8 certificates and vouchers, TVRHA reported that persons with disabilities and the elderly are given priority over single applicants who are not elderly and who do not have disabilities. Renting units with Section 8 assistance is generally not a problem for persons with disabilities, as they usually have a landlord in mind who has been contacted and is willing to work with them, according to TVRHA. However, few landlords are willing to make expensive modifications for tenants they are unfamiliar with because they do not know how long the tenants will stay. A TVRHA official told us that as a result, it may sometimes take persons with disabilities a little longer to secure a lease if units need various changes to comply with HUD standards. TVRHA officials said that persons with disabilities usually prefer public housing instead of certificates or vouchers because the public housing units are better equipped for their needs.

An official from the Housing Authority of the City of Corinth told us that the authority had no need to designate housing for the elderly. It operates a 100-unit development for the elderly and persons with disabilities. At the time of our visit, 17 of the units were occupied by persons with disabilities, but most of these tenants were between 50 and 58 years old and fit in well with the older residents. He also told us that younger persons with disabilities do not generally apply to live in this building. Were the situation to change and problems were to develop, the housing authority might consider submitting an allocation plan to designate housing, the official said.

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## **Housing Authority of Gloucester County**

Gloucester County, New Jersey, with a population of about 230,000, is located within the highly urbanized Philadelphia metropolitan area, although many parts of the county are rural or small-town in nature. In 1990, about 35 percent of the county's 79,000 households had low or moderate incomes, according to data provided by Gloucester County. Because housing costs had risen much faster than household incomes, almost 22 percent of all households paid over 30 percent of their gross income for housing costs. The overall housing vacancy rate in the county was 4.4 percent.

In 1997, HUD awarded the Housing Authority of Gloucester County 130 Section 8 vouchers for persons with disabilities as an alternative to units in a building the authority had designated for the elderly in 1993. The

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authority submitted an allocation plan in 1997 to designate additional housing for the elderly, but HUD denied the plan because it lacked necessary information. However, in March 1998, HUD conditionally approved the authority's revised allocation plan subject to certain revisions.

The authority has 262 public housing units and manages another building with 199 units that receive Section 8 project-based rental assistance. With the exception of 20 units for people with mobility impairments, the authority designated this 199-unit building for the elderly in 1993.<sup>43</sup> To compensate for any loss of housing for persons with disabilities, the authority applied for and received 130 additional vouchers because 133 younger persons with disabilities were on its waiting lists for other programs. Of the authority's 1,485 regular Section 8 certificates and vouchers, 260 were used by persons with disabilities and 252 by elderly persons at the time of our visit.

In addition to the Housing Authority of Gloucester County, the Housing Authority of the Borough of Glassboro also administers public housing and Section 8 certificates in Gloucester County. Table III.6 shows the number of subsidized units in the county.

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<sup>43</sup>This building is owned by Senior Housing Development Corporation of Gloucester County, an instrumentality of the Housing Authority of Gloucester County, which is the managing agent. The building is a Section 8 non-FHA-insured, federally funded project with a Housing Assistance Payments contract. Because the building was originally built for the elderly in 1979, the authority was able to designate it for elderly occupancy under section 651 of the 1992 act.

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**Table III.6: Public and Assisted  
Housing in Gloucester County**

<b>Type of housing</b>	<b>Number of units</b>
Public housing (Housing Authority of Gloucester County)	262
Public housing (Housing Authority of the Borough of Glassboro)	180
Section 8 certificates and vouchers, including 130 vouchers for persons with disabilities (Housing Authority of Gloucester County)	1,615
Section 8 certificates (Housing Authority of the Borough of Glassboro)	112
State agency certificates and vouchers (State of New Jersey)	176
Rural rental housing <sup>a</sup>	248
HUD, project-based	1,431
<b>Total</b>	<b>4,024</b>

<sup>a</sup>USDA Rural Development provides subsidized rental units.

Sources: USDA Rural Development and HUD.

Besides the units already designated for the elderly, the allocation plan the authority submitted unsuccessfully in 1997 would have limited two high-rise buildings with a total of 200 units to elderly and near-elderly tenants aged 50 and over. The authority’s director told us he plans to modify the plan and resubmit it to HUD for approval.

Advocates both for the elderly and for persons with disabilities said the housing problem in Gloucester County was a lack of affordable housing, not necessarily mixing the two populations. Overall, advocates for the disabled said that the younger persons with disabilities should have the freedom to choose where they live because not all of them want to live with the elderly or with other persons with disabilities. However, this group may want to select units in buildings for the elderly because many offer important amenities, such as security, transportation, and supportive services. An official from the county office for the disabled said that security is especially important for people who have visual or hearing impairments. At the same time, younger persons with disabilities who are capable of living independently usually prefer to do so. An official from the department on aging said that she believes the elderly prefer to live among other elderly because of the conflicting lifestyles of younger persons with disabilities.

At the time of our visit, it was too soon to determine the impact of the special vouchers on the supply of affordable housing for persons with disabilities because the authority was just beginning to issue them. To administer the 130 vouchers after HUD awarded funding in September 1997, the authority hired a full-time staff person, who had then spent several months in training before working with persons with disabilities full time. As of January 1, 1998, 40 vouchers had been provided to persons with disabilities, 10 of which had been successfully used to obtain housing. An official said it was hoped the other 30 recipients would have housing by February 1. The number of persons with disabilities on the authority's waiting list has increased in the time since the authority applied for the 130 vouchers. Staff said they would apply for additional vouchers if necessary.

The turnback rate for Section 8 certificates and vouchers issued to persons with disabilities is about the same as for other Section 8 applicants—for every three certificates or vouchers issued, two are returned, according to authority officials. Among the reasons they cited were applicants' not being able to afford security deposits or utility bills and some applicants' requesting rental assistance as a token effort to please their families, then returning the certificates or vouchers unused.

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## Anaheim Housing Authority

Anaheim is a city with a population of approximately 300,000 in Orange County in southern California. The Anaheim Housing Authority administers no public housing and therefore has no allocation plan, but it provides other housing assistance, including Section 8 rental certificates and vouchers. Housing authority officials told us they applied for 100 vouchers exclusively for persons with disabilities because they had a high number of these people on their waiting list for housing assistance—about 1,500 of the 6,000 individuals listed. The authority recently received those vouchers from HUD's 1997 funding for Mainstream Housing Opportunities for Persons With Disabilities (the mainstream program).

The need for affordable housing in Anaheim, particularly for the elderly and for persons with disabilities, is great, according to officials of the housing authority and of advocacy groups we spoke with. HUD data indicate that 70 percent of the city's elderly residents pay more than 30 percent of their income for rent, with many paying more than 50 percent. According to an advocacy group for persons with disabilities, its clients' incomes are about \$600 a month, making the typical rents for a one-bedroom apartment of \$580 to \$640 per month unaffordable.

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**Appendix III**  
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Subsidized private housing projects for the elderly and for persons with disabilities provide 391 affordable units in Anaheim. Of the approximately 3,400 low-income households receiving Section 8 certificates and vouchers in Anaheim in 1995, about 1,300 were elderly or persons with disabilities.

At the time of our visit, the Anaheim Housing Authority had not yet issued any of the 100 vouchers HUD had awarded under the mainstream program for persons with disabilities. Housing authority officials said they expected to use all of them, however, and planned to apply for more vouchers in the future because of the demand.

The effects of the 1992 act in Anaheim have been positive for persons with disabilities, according to the housing authority officials, who believed it had increased the number of affordable housing opportunities for this group. Because of the mainstream program vouchers, they said they expected to be housing persons with disabilities on their waiting list at a faster rate than other applicants.

On the basis of their previous experience with regular certificates and vouchers, housing authority officials said they do not anticipate difficulties or delays in using the mainstream program vouchers. They said persons with disabilities and the elderly have been relatively easy to place compared with low-income families, which tend to be more transient and often move out of the Anaheim area before they use their certificates or vouchers. The housing authority officials anticipated greater difficulty with placing persons with mental disabilities. According to these officials, evictions have been more common with this particular group than with others, but they believe that this problem can be averted if these tenants receive the necessary support services.

To assist individuals in using the vouchers, the housing authority plans to assemble a list of accessible rental units, provide assistance to landlords willing to make modifications to make their properties accessible, assign a full-time housing counselor to help the mainstream program participants, and work with local nonprofit agencies to get tenants additional support services. The mainstream vouchers will be offered first to the persons with disabilities who have been on the housing authority's waiting list the longest.

Officials of the housing authority and the advocacy group for the disabled with whom we spoke generally agreed that "mainstreaming" is the best housing option for persons with disabilities, although they did not see a

particular problem in housing elderly and persons with disabilities together. Housing authority officials qualified this by saying that mainstreaming is usually the best option for persons with physical disabilities, whereas persons with mental and developmental disabilities usually do better in group settings where they get the emotional support and the services that they need. Officials we spoke with at an advocacy group for persons with disabilities fully supported mainstreaming in all cases because they believed that segregation perpetuates stereotypes and prevents persons with disabilities from believing that they can take care of themselves or work.

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## **San Francisco Housing Authority**

San Francisco is a racially and ethnically diverse city of about 760,000 people in northern California. The San Francisco Housing Authority has not submitted an allocation plan and has not obtained certificates or vouchers exclusively for persons with disabilities. While the authority administers almost 5,000 certificates and vouchers, San Francisco's housing market is extraordinarily tight and finding landlords willing to accept Section 8 applicants—with or without disabilities—has become a serious problem, according to housing authority officials.

The vacancy rate for rental units is very low, and rents have gone up substantially in the past 2 years, with the median market rent for a one-bedroom apartment in larger buildings at over \$1,500. According to information provided by the Mayor's Office of Housing, affordable housing is thus extremely scarce in San Francisco, and 55 percent of low-income and 73 percent of very low-income renter households pay more than 30 percent of their incomes in rent. Overcrowding and homelessness are also significant problems.

Advocates for persons with disabilities with whom we spoke universally described the housing situation for persons with disabilities in San Francisco as extremely dire. The housing stock is generally old, and units tend to be small. The topography of the city, with its many hills, limits accessibility for persons with disabilities and makes apartment-hunting difficult. Less than 2 percent of the city's private rental stock is estimated to be minimally accessible to people with physical disabilities. The situation is particularly difficult because discrimination against persons with both physical and mental disabilities is believed to be pervasive.

The San Francisco Housing Authority has 43 developments with a total of 6,722 units of public housing serving 12,436 residents. Twenty-one of these



developments, serving 2,165 residents, are intended to be elderly/disabled housing. Roughly 9 percent of the residents of these developments are persons with disabilities who are under the age of 60. The housing authority settled a class-action lawsuit in 1991 by agreeing to increase its number of handicapped-accessible units. A Special Master appointed by the court is assisting in the implementation of the settlement. At the time of our visit, the authority had only 144 accessible public housing units, but it was adapting several hundred more and expected to have 690 accessible or adaptable units within a few years.

In addition to public housing, San Francisco has 9,892 project-based units in 87 developments that either have federally insured mortgages or receive federal subsidies. The San Francisco Housing Authority also administers 4,945 Section 8 certificates and vouchers. The authority has not applied for any certificates or vouchers since about late 1995 because of various internal problems, an official said.

With the recent tightening of the housing market, finding landlords willing to rent to people with Section 8 certificates and vouchers has become problematic, in large part because HUD's fair market rents are considered too low, according to both housing authority officials and advocates. Authority staff said that in their experience, about 15 percent of those receiving certificates or vouchers turn them back, mostly because they cannot find affordable rental units; another 30 percent or so have to move outside of San Francisco to find affordable housing. HUD is currently collecting data and considering modifications to its fair market rent in San Francisco.

The waiting lists for all types of subsidized housing are very long, according to authority officials. About 11,600 people are on the waiting list for public housing, with an average wait of at least 2.5 to 3 years. For persons with disabilities, the wait is slightly longer because of a shortage of studio and one-bedroom apartments, though for persons requiring handicapped-accessible units the wait is slightly shorter. The waiting list for certificates and vouchers has not been opened since 1986, when about 10,000 people applied; as of February 1998, the authority was still working off that list. The wait for units in the project-based Section 8 developments we visited was at least 3 to 5 years.

The authority had put together an exploratory committee in the early 1990s to consider the issue of designating certain buildings of its own as elderly-only, but the committee fell to the wayside because of other

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pressing concerns. The authority has been working with a HUD recovery team, and authority officials said that once the current restructuring is complete, the issue will be revisited and an allocation plan will likely be submitted to HUD.

The authority first explored the possibility of submitting an allocation plan to designate housing because of a perceived conflict between elderly residents and younger persons with disabilities and a strong consensus among the elderly tenants that they would prefer to live among other seniors. Elderly residents complained that younger tenants played loud music; had guests at all hours of the night; and displayed intimidating, threatening, or bizarre behavior. The main source of concern was younger residents who were mentally ill. Housing authority officials estimated that 70 to 80 percent of the younger residents with disabilities had mental rather than physical disabilities.

When the idea of designating buildings as elderly-only was initially discussed, many of the younger tenants with disabilities expressed strong concerns. We spoke with representatives of five advocacy organizations for persons with disabilities. Some said that the concerns about mixing the elderly and younger persons with disabilities were misguided and based largely on overreaction and misunderstanding. In general, they feared that elderly-only designations would reduce the housing options for persons with disabilities. This is a special concern in San Francisco, they said, where public housing and project-based Section 8 housing are the only viable alternatives for many persons with disabilities because it is so difficult to find affordable and accessible housing using a certificate or voucher. The advocates opposed segregating persons with disabilities in housing designated disabled-only, which they perceived as isolating, unfair, and antithetical to the ideal of integrating persons with disabilities into mainstream society.

# Public Housing Survey Instrument and Results

United States General Accounting Office

GAO

## Survey on Public Housing for Persons With Disabilities

### Introduction

The U.S. General Accounting Office is an agency that gathers information for the U.S. Congress. Currently we are gathering information about federally supported public housing that is available to persons with disabilities.

We are asking public housing authorities (PHAs) that either have an approved Allocation Plan or have received additional rental certificates and vouchers from HUD for the exclusive use of persons with disabilities to complete and return this survey.

Your response is critical in order for us to have complete information for our report to the Congress. Please return the survey in the enclosed postage paid envelope within two weeks of receiving it. This will help us avoid costly follow-up. In the event the envelope is misplaced, our return address is

Martha Chow  
U.S. General Accounting Office  
441 G Street, N.W., Room 1826  
Washington, D.C. 20548-0001

Thank you for your assistance. If you have any questions, please feel free to call Martha Chow at (202) 512-6749, email (chowm.rced@gao.gov).

→Analysis Note: Questions 1-2 and 4-24 are filled in for PHAs with approved allocation plans. Questions 27-39 are filled in for PHAs answering "Yes" to Question 26.

### Public Housing

1. How many units (e.g., apartments) of federally supported public housing are there in your PHA, including units for the elderly and/or persons with disabilities as well as other units of public housing? (Enter number.) (5-10)

331,031 TOTAL units of public housing

2. As of November 1, 1997, how many of your federally supported units of public housing (e.g., apartments) were in each of the following categories? (Enter number or zero for each.) (11-46)

34,679 Elderly-only units

948 Disabled-only units

36,106 Elderly/disabled units

257,765 Other units (e.g., "family" units)

1,789 Units for administrative use  
(maintenance/management apartments,  
offices, etc.)

331,034 TOTAL units of public housing

3. Does your PHA have an approved Allocation Plan? (Check one.) (47)

73 Yes

19 No →Skip to Question 25

4. When was your Allocation Plan approved? (Enter date.) (48-53)

1994—4; 1995—22; 1996—12; 1997—35

5. Before you submitted your Allocation Plan, how many of your federally supported public housing units (e.g., apartments) were in buildings reserved primarily for elderly persons and persons with disabilities? (Enter number.) (54-59)

69,337 Units in elderly/disabled buildings

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**Elderly-only Units**

6. In your Allocation Plan, did you designate any public housing units (e.g., apartments) as "elderly-only?" (Check one.)

64 Yes

9 No →Skip to Question 11

(60)

7. How many of the public housing units (e.g., apartments) you designated in your Allocation Plan as "elderly-only" came from (a) buildings formerly reserved for elderly/disabled, (b) other public housing (e.g., buildings often referred to as "family" buildings), and (c) how many were newly constructed units? (Enter number or zero for each.)

(24-27)

24,471 (a) Units from elderly/disabled buildings

64 (b) Units from other public housing

367 (c) Newly constructed or acquired units

24,902 TOTAL units designated as "elderly-only" in your Allocation Plan

8. How many of your elderly-only public housing units (e.g., apartments) were occupied by elderly heads of household (a) when you submitted your Allocation Plan (this number may be in your Plan) and (b) as of November 1, 1997? (Enter number or zero for each.)

(28-39)

14,814 (a) Elderly-only units with elderly head of household as of date of Allocation Plan

15,828 (b) Elderly-only units with elderly head of household as of November 1, 1997

→Analysis Note: Questions 8-10 are filled in for 53 PHAs that provided all the information requested in these questions. These PHAs account for 21,354 of the total units reported in Question 7.

9. How many of your elderly-only public housing units (e.g., apartments) were occupied by nonelderly heads of households with disabilities (a) when you submitted your Allocation Plan (this number may be in your Plan) and (b) as of November 1, 1997? (Enter number or zero for each.)

(40-51)

4,094 (a) Elderly-only units with head of household who has a disability and is not elderly, as of date of Allocation Plan

3,028 (b) Elderly-only units with head of household who has a disability and is not elderly, as of November 1, 1997

10. How many, if any, of your elderly-only public housing units (e.g., apartments) were occupied by heads of household who are not elderly and do not have a disability, (a) when you submitted your Allocation Plan (this number may be in your Plan) and (b) as of November 1, 1997? (Enter number or zero for each.)

(52-63)

427 (a) Elderly-only units with head of household who is not elderly and does not have a disability, as of date of Allocation Plan

374 (b) Elderly-only units with head of household who is not elderly and does not have a disability, as of November 1, 1997

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**Disabled-only Units**

11. In your Allocation Plan, did you designate any units (e.g., apartments) as “disabled-only”? *(Check one.)* (64)

13 Yes

60 No →Skip to Question 16

12. How many of the public housing units (e.g., apartments) you designated in your Allocation Plan as “disabled-only” came from (a) buildings formerly reserved for elderly/disabled, (b) other public housing (e.g., buildings often referred to as “family” buildings), and (c) how many were newly constructed units? *(Enter number or zero for each.)* 3(4-27)

620 (a) Units from elderly/disabled buildings

115 (b) Units from other public housing

53 (c) Newly constructed or acquired units

788 TOTAL units designated as “disabled-only” in your Allocation Plan

13. How many of your disabled-only public housing units (e.g., apartments) were occupied by elderly heads of household (a) when you submitted your Allocation Plan (this number may be in your Plan) and (b) as of November 1, 1997? *(Enter number or zero for each.)* (28-39)

218 (a) Disabled-only units with elderly head of household as of date of Allocation Plan

207 (b) Disabled-only units with elderly head of household as of November 1, 1997

→Analysis Note: Questions 13-15 are filled in for 13 PHAs that provided all the information requested in these questions. These PHAs account for all of the total units reported in Question 12.

14. How many of your disabled-only public housing units (e.g., apartments) were occupied by nonelderly heads of households with disabilities (a) when you submitted your Allocation Plan (this number may be in your Plan) and (b) as of November 1, 1997? *(Enter number or zero for each.)* (40-51)

445 (a) Disabled-only units with head of household who has a disability and is not elderly, as of date of Allocation Plan

465 (b) Disabled-only units with head of household who has a disability and is not elderly, as of November 1, 1997

15. How many, if any, of your disabled-only public housing units (e.g., apartments) were occupied by heads of household who are not elderly and do not have a disability (a) when you submitted your Allocation Plan (this number may be in your Plan) and (b) as of November 1, 1997? *(Enter number or zero for each.)* (52-63)

9 (a) Disabled-only units with head of household who is not elderly and does not have a disability, as of date of Allocation Plan

9 (b) Disabled-only units with head of household who is not elderly and does not have a disability, as of November 1, 1997

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**Elderly and Disabled Units**

16. In your Allocation Plan, did you designate any units (e.g., apartments) as “elderly and disabled?” (Check one.)

29 Yes (64)  
44 No →Skip to Question 18

17. How many of the public housing units (e.g., apartments) you designated in your Allocation Plan as “elderly and disabled” came from (a) buildings formerly reserved for elderly/disabled, (b) other public housing (e.g., buildings often referred to as “family” buildings), and (c) how many were newly constructed units? (Enter number or zero for each.)

8,300 (a) Units from elderly/disabled buildings 4(4-27)

52 (b) Units from other public housing

2 (c) Newly constructed or acquired units

8,366 TOTAL units designated as “elderly and disabled” in your Allocation Plan

18. How many federally supported public housing units are there in your PHA which are for elderly/disabled persons but were not designated as “elderly and disabled” in your Allocation Plan? (Enter number or zero.)

23,870 Elderly/disabled units not designated as “elderly and disabled” in Allocation Plan (28-33)

→Analysis Note: Questions 19-21 are filled in for the 47 PHAs that provided all the information requested in these questions. They account for 7,311 of the units reported in Question 17 and 16,194 of the units reported in Question 18.

19. How many of all your elderly/disabled public housing units (e.g., apartments)—those designated in your plan as “elderly and disabled” (Question 17) and any other units for elderly/disabled (Question 18)—were occupied by elderly heads of household (a) when you submitted your Allocation Plan (this number may be in your Plan) and (b) as of November 1, 1997? (Enter number or zero for each.)

11,908 (a) Elderly/disabled units with elderly head of household as of date of Allocation Plan (34-45)

11,013 (b) Elderly/disabled units with elderly head of household as of November 1, 1997

20. How many of all your elderly/disabled public housing units (e.g., apartments)—those designated in your plan as “elderly and disabled” (Question 17) and any other units for elderly/disabled (Question 18)—were occupied by nonelderly heads of households with disabilities (a) when you submitted your Allocation Plan (this number may be in your Plan) and (b) as of November 1, 1997? (Enter number or zero for each.)

6,554 (a) Elderly/disabled units with head of household who has a disability and is not elderly, as of date of Allocation Plan (46-57)

7,026 (b) Elderly/disabled units with head of household who has a disability and is not elderly, as of November 1, 1997

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21. How many, if any, of *all* your elderly/disabled public housing units (e.g., apartments) —those designated in your plan as “elderly and disabled” (Question 17) and any other units for elderly/disabled (Question 18)—were occupied by heads of household who are not elderly and do not have a disability, (a) when you submitted your Allocation Plan (this number may be in your Plan) and (b) as of November 1, 1997? (Enter number or zero for each.) (58-69)

638 (a) Elderly/disabled units with head of household who is not elderly and does not have a disability, as of date of Allocation Plan

686 (b) Elderly/disabled units with head of household who is not elderly and does not have a disability, as of November 1, 1997

**Effects of Designation**

22. About how many nonelderly adults with disabilities (who were head of household) moved out of your elderly-only public housing units from the time your Allocation Plan was approved until November 1, 1997? (Enter number or check “Do not know.”) (70-75)

618 Number who moved out of elderly-only units (If zero, skip to Question 24.)

24 Do not know →Skip to Question 24

23. Of those persons with disabilities who moved out of your elderly-only units, about how many moved to each of the following types of housing? (Enter number or zero for each.) 5(4-18)

80 Other public housing unit

138 Section 8 certificate or voucher in private market housing

275 All other places

24. Not considering any rental certificates and vouchers you may have received as a condition of your approved Allocation Plan, to what extent has the designation of units in your PHA as “elderly-only”, “disabled only” or “elderly and disabled” helped or hindered the PHA’s ability to meet the housing needs of (a) persons with disabilities and (b) elderly persons in your area? (Check all that apply.) (19-29)

**Persons with Disabilities (Check one.)**

8 Greatly helped

12 Somewhat helped

47 Neither helped nor hindered

2 Somewhat hindered

1 Greatly hindered

**Elderly Persons (Check one.)**

33 Greatly helped

16 Somewhat helped

21 Neither helped nor hindered

0 Somewhat hindered

0 Greatly hindered

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**Rental Certificates and Vouchers**

25. Has your PHA requested from HUD any rental certificates or vouchers for the exclusive use of persons with disabilities? *(Check one.)*

- 70 Yes
- 26 No

(30)

26. Has your PHA received from HUD any rental certificates or vouchers for the exclusive use of persons with disabilities? *(Check one.)*

- 59 Yes
- 37 No →*Skip to Question 40*

(31)

27. Were the rental certificates and/or vouchers for the exclusive use of persons with disabilities received as a condition of your approved Allocation Plan? *(Check one.)*

- 29 Yes
- 25 No
- 4 Not sure

(32)

28. Under which of the following HUD Notices of Funding Availability (NOFA) did you receive certificates and vouchers for exclusive use by persons with disabilities? *(Check all that apply.)*

- 6 NOFA for the Rental Voucher Program and Rental Certificate Program, issued on March 3, 1995, and amended on September 29, 1995
- 19 NOFA for Rental Assistance for Persons with Disabilities, in Support of Designated Housing Allocation Plans, issued on October 30, 1996
- 27 NOFA for Mainstream Housing Opportunities for Persons with Disabilities (Mainstream Program), Fiscal Year 1997, issued on April 10, 1997
- 9 NOFA for Rental Assistance for Persons with Disabilities in Support of Designated Housing Allocation Plans and Establishment of Preference for Certain Section 8 Developments, issued on April 10, 1997
- 4 Unsure

(33-37)

29. In your opinion, how easy or difficult was it for your PHA to apply for, and receive rental certificates or rental vouchers for the exclusive use of persons with disabilities? *(Check one.)*

- 11 Very easy
- 19 Somewhat easy
- 20 Neither easy nor difficult
- 7 Somewhat difficult
- 1 Very difficult

(38)

30. How many rental certificates and/or vouchers for the exclusive use of persons with disabilities did you receive? *(Enter number or zero for each.)*

(39-44)

2,477 Rental certificates  
2,466 Rental vouchers

31. How many of these rental certificates and vouchers have been issued, how many have been used, and how many have persons with disabilities turned back to the PHA? *(Enter number or zero for each.)*

(45-62)

**Rental certificates**

753 Total issued  
551 Number used  
124 Number turned back to PHA

**Rental vouchers**

805 Total issued  
611 Number used  
50 Number turned back to PHA

→**Analysis Note:** Not all PHAs were certain under which NOFA they received certificates and vouchers. According to HUD, the correct responses to the first four categories of Question 28 are 10, 25, 25, and 5, respectively.



**Appendix IV  
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32. Based on your experience, is the turnback rate for these rental certificates and vouchers given to persons with disabilities higher or lower than the turnback rate for certificates and vouchers given to persons in your area who do not have disabilities or are the turnback rates about the same? *(Check one.)*

(63)

- 3 Much higher turnback rate for persons with disabilities
- 2 Somewhat higher turnback rate for persons with disabilities
- 13 About the same
- 4 Somewhat lower turnback rate for persons with disabilities
- 2 Much lower turnback rate for persons with disabilities
- 0 No experience with rental certificates and vouchers for persons with disabilities
- 1 No experience with rental certificates and vouchers for persons without disabilities
- 30 Too early to tell

33. In your opinion, how easy or difficult has it been for persons with disabilities to utilize these rental certificates and rental vouchers? *(Check one.)*

(64)

- 3 Very easy
- 11 Somewhat easy
- 8 Neither easy nor difficult
- 5 Somewhat difficult
- 2 Very difficult
- 26 Too early to tell

34. About how long, on average, has it taken persons with disabilities and other persons to use their rental certificates and vouchers? *(Check all that apply.)*

(65-75)

**Persons with Disabilities** *(Check one.)*

- 8 0 - 30 days
- 24 31 - 60 days
- 11 61 - 90 days
- 7 91 - 120 days
- 1 More than 120 days

**Other Persons** *(Check one.)*

- 8 0 - 30 days
- 25 31 - 60 days
- 11 61 - 90 days
- 5 91 - 120 days
- 1 More than 120 days

35. Compared to other persons, have persons with disabilities needed more, less or about the same amount of assistance from the PHA or other organizations in locating and obtaining housing where they can use their rental certificates and vouchers? *(Check one.)*

(76)

- 15 Much more assistance needed for persons with disabilities
- 28 Somewhat more assistance needed for persons with disabilities
- 11 About the same
- 1 Somewhat less assistance needed for persons with disabilities
- 0 Much less assistance needed for persons with disabilities

**Appendix IV  
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36. How many of the rental certificates and vouchers you received for persons with disabilities were used to move persons with disabilities from public housing units in this PHA to private housing and how many were used to provide housing for other persons with disabilities in the categories listed below? (Enter number or zero for each.) 6(4-27)

204 Used by persons with disabilities living in your public housing

638 Used by persons with disabilities on your public housing waiting list

317 Used by persons with disabilities on your Section 8 waiting list for certificates and vouchers

0 Used by persons with disabilities living in private Section 8 projects where elderly preferences were established

0 Used by persons with disabilities living in other private Section 8 projects

0 Used by persons with disabilities on private Section 8 waiting lists

0 Other (Please specify.)

1147 TOTAL certificates and vouchers used

37. In your opinion, to what extent have the rental certificates and vouchers you received helped your PHA meet the housing needs of persons with disabilities in your area? (Check one.) (28)

  1   Little or no extent

  8   Some extent

  7   Moderate extent

 11  Great extent

  8   Very great extent

 23  Too early to tell

38. To what extent, if any, have the rental certificates and vouchers you received alleviated any potential housing shortage for persons with disabilities that may have resulted from the designation of public housing units as "elderly only?" (Check one.) (29)

  9   Little or no extent

  7   Some extent

  3   Moderate extent

  9   Great extent

  4   Very great extent

 14  Too early to tell

 11  No units designated as "elderly only"

39. To what extent, if any, have the rental certificates and vouchers you received alleviated any potential housing shortage for persons with disabilities that may have resulted from the establishment of elderly-only preferences by owners of Section 8 projects? (Check one.) (30)

  9   Little or no extent

  4   Some extent

  1   Moderate extent

  3   Great extent

  1   Very great extent

 16  Too early to tell

 24  No basis to judge

**Appendix IV  
Public Housing Survey Instrument and  
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**Preferences**

40. To which of the following persons does your PHA give preference for its public housing units that are not designated in the Allocation Plan as "elderly-only," "disabled-only," or "elderly and disabled" (e.g., for its "family" and other non-designated units)? (Check all that apply.)

- 23 Persons aged 62 or older
- 9 Persons aged 50 to 61 (near elderly)
- 24 Persons with disabilities
- 26 Homeless persons
- 35 Displaced persons
- 29 Persons with high rent burden (50% of income) or living in substandard housing
- 35 Persons with working income
- 3 Persons with AIDS
- 43 Local residents
- 30 Other (Please specify.)

(31-41)

41. Not counting any certificates and vouchers that you received for the exclusive use of persons with disabilities, to which of the following persons does your PHA give preference for its other Section 8 rental certificates and vouchers? (Check all that apply.)

- 19 Persons aged 62 or older
- 4 Persons aged 50 to 61 (near elderly)
- 26 Persons with disabilities
- 36 Homeless persons
- 43 Displaced persons
- 31 Persons with high rent burden (50% of income) or living in substandard housing
- 31 Persons with working income
- 6 Persons with AIDS
- 45 Local residents
- 25 Other (Please specify.)

(42-52)

42. Please provide below the name, title, phone number and email address, if available, of the person we should contact if we need further information concerning the survey response for your PHA.

Name \_\_\_\_\_

Title \_\_\_\_\_

Phone \_\_\_\_\_

Email \_\_\_\_\_

43. Please provide any additional comments you may have in the space below.

(53)

Thank you for your cooperation.

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# Section 8 Certificates and Vouchers for Persons With Disabilities

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Since passage of the Housing and Community Development Act of 1992, HUD has made Section 8 certificates and vouchers for persons with disabilities available in two ways: in connection with designated housing or through a mainstream housing opportunities program.<sup>44</sup> The funds for these certificates and vouchers, totaling \$278.9 million, came from HUD's administrative set-asides and from congressional set-asides in HUD's appropriations.

The purpose of Section 8 certificates and vouchers awarded in connection with designated housing is to offset the effects of reserving units in public and privately owned, HUD-subsidized housing for elderly residents. To receive certificates and vouchers in connection with designated public housing, a PHA must have a HUD-approved allocation plan. While HUD is more inclined to award certificates and vouchers to a PHA that has designated units for the elderly that were previously available to younger people with disabilities, HUD officials told us that they look at other factors as well in determining how many certificates and vouchers a PHA should receive in connection with designated housing. These factors include the PHA's vacancy rates, the demand for affordable housing by persons with disabilities, and the availability of other types of housing to persons with disabilities, including efficiencies and one-bedroom units in the PHA's family developments. The number of certificates or vouchers HUD awards a PHA is not a one-for-one replacement for the units that the PHA has designated as elderly-only. Moreover, designating units as elderly-only does not guarantee that a PHA will receive additional certificates and vouchers. These certificates and vouchers have budget authority terms of 1, 2, and 5 years, depending on the funding.<sup>45</sup>

In communities where privately owned, HUD-subsidized projects have established preferences for the elderly, the housing authorities can apply for certificates and vouchers if they can identify the number of nonelderly persons with disabilities who are not receiving housing assistance as a result of these preferences. To prepare their applications, the housing authorities may seek assistance from their local HUD field offices to identify these privately owned projects. These certificates and vouchers have 1-year terms.

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<sup>44</sup>HUD has also made certificates and vouchers available for special groups of persons with disabilities, such as those who are also homeless or those who are also veterans. We did not include these certificates and vouchers in our analysis.

<sup>45</sup>The different terms reflect the amount of budget authority that the Congress provides to HUD for a given period of time to fund certain certificates and vouchers. These terms have no impact on how long a recipient can use a certificate or voucher, but housing authorities usually prefer a longer term because it represents a longer funding commitment by HUD.

The mainstream housing program is intended to provide persons with disabilities greater opportunities to find affordable housing of their choice in their communities (hence, the term “mainstreaming”). Any housing authority that administers the Section 8 rental assistance program is eligible to apply for the mainstream certificates and vouchers and may issue them to any persons with disabilities eligible for Section 8 assistance. The requirements for the mainstream certificates and vouchers are less restrictive than those for certificates and vouchers connected with designated housing, and PHAS are not required to submit allocation plans to qualify. The mainstream program’s certificates and vouchers have terms of 5 years.

As of November 1, 1997, HUD had made available \$190.4 million of the total \$278.9 million set aside since 1992 for certificates and vouchers for persons with disabilities. To do so, HUD issued four notices of funding availability: one in March 1995, another in October 1996, and two in April 1997. The remaining \$88.5 million was from HUD’s fiscal year 1998 appropriation: \$40 million of it to be used in connection with designated public and private housing and \$48.5 million to be used for the mainstream program.<sup>46</sup> HUD issued a fifth notice of funding availability on April 30, 1998, for these funds and for the funds remaining from the fiscal year 1997 appropriation of \$50 million.

As table V.1 shows, only the funds made available through two of the notices have been totally awarded: the \$13.3 million made available through the March 1995 notice and the \$48.5 million made available through the April 1997 notice for the mainstream program. Of the \$78.6 million HUD made available through its October 1996 notice, \$48.7 million had been awarded as of November 1, 1997, and HUD was continuing to make awards. HUD said that between November 1, 1997, and March 1, 1998, it had awarded another \$15 million from the October 1996 notice to PHAS with newly approved allocation plans. HUD expected to award the remainder of the funds by the end of fiscal year 1998.

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<sup>46</sup>The \$48.5 million represents 25 percent of fiscal year 1997 funds appropriated for the Section 811 program for the capital development of privately owned projects for persons with disabilities. In the fiscal year 1998 appropriation, the Congress also authorized the Secretary of HUD, at his discretion, to use up to 25 percent of the Section 811 funds for Section 8 certificates and vouchers for persons with disabilities.

**Appendix V  
Section 8 Certificates and Vouchers for  
Persons With Disabilities**

**Table V.1: HUD Notices of Funding Availability for Persons With Disabilities, as of November 1, 1997**

<b>Date of notice</b>	<b>Purpose of notice</b>	<b>Total funds available (millions)</b>	<b>Total awarded (millions)</b>	<b>Number of housing authorities receiving awards<sup>a</sup></b>
March 1995	Designated housing through allocation plan	\$13.3 <sup>b</sup>	\$13.3	10
October 1996	Designated housing through allocation plan	78.6	48.7	25
April 1997	Mainstream housing	48.5	48.5	25
April 1997	Designated housing through allocation plan and establishment of preferences by privately owned projects	50.0	2.7	5

<sup>a</sup>Six PHAs received certificates and vouchers for both designated housing and mainstream purposes.

<sup>b</sup>In the March 1995 funding notice, HUD originally made available \$85.6 million, of which half was used for certificates and vouchers in conjunction with allocation plans and half for the general mainstream program. HUD subsequently rescinded most of this funding. The \$13.3 million is the actual amount obligated.

Source: HUD.

Of the \$50 million made available under HUD's 1997 notice made in connection with designated public and private housing, \$2.7 million had been awarded as of November 1, 1997. The funds made available through the notice were set aside by the Congress in HUD's fiscal year 1997 appropriation. Half of the money was earmarked for PHAs with approved allocation plans, the other half for housing authorities that could identify the impact that elderly preferences established by privately owned projects in their communities had on persons with disabilities. As of November 1, 1997, none of the \$25 million for PHAs with approved allocation plans had been awarded. HUD officials said the money will be used once all the funding from the October 1996 notice is awarded. Of the \$25 million earmarked to offset elderly preferences established by privately owned projects, HUD had awarded \$2.7 million to five PHAs that were able to identify the impact the preferences had on persons with disabilities.

As mentioned previously, the funding made available under the other notice HUD issued in April 1997—the notice for the mainstream program—had been totally awarded by November 1, 1997. The \$48.5 million made available through this notice came from the fiscal year 1997 funds appropriated for the Section 811 program for the capital development of privately owned projects for persons with disabilities.

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**Appendix V**  
**Section 8 Certificates and Vouchers for**  
**Persons With Disabilities**

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According to HUD, 281 PHAS submitted approvable applications for this disproportionately more popular program, but HUD was able to award funds to only 25, providing them with 1,756 certificates and vouchers.

# Major Contributors to This Report

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Housing and  
Community  
Development Issue  
Area

Stanley J. Czerwinski, Associate Director  
Jason Bromberg  
Martha Chow  
J. Davis  
Dennis Fricke  
Jacqueline Garza  
Diana Gilman  
Mathew Scire

---

Design, Methodology,  
and Technical  
Assistance Group

Carolyn Boyce

---

Writing and Editing  
Group

Leslie Albin

---

Office of the General  
Counsel

John T. McGrail



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