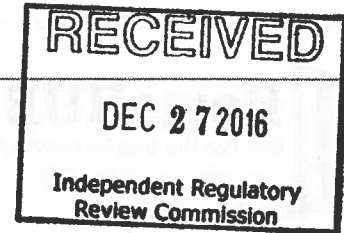


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14-540-(271)

Kroh, Karen

From: Mochon, Julie
Sent: Wednesday, December 21, 2016 8:45 AM
To: Kroh, Karen
Subject: FW: Comments on Home and Community-Based Supports and Licensing



From: Cindy [<mailto:cindy@housingalliancepa.org>]
Sent: Tuesday, December 20, 2016 4:32 PM
To: Mochon, Julie
Subject: Comments on Home and Community-Based Supports and Licensing

Dear Ms. Mochon:

Please accept these comments to the Department of Human Services Proposed Rulemaking on Home and Community-Based Supports and Licensing, 46 Pa.B. 7061.

Section 6100.447(b) of the proposed rule states:

(b) No more than 10% of the units in an apartment, condominium or townhouse development may be funded in accordance with this chapter.

This section differs from all the others in 6100.441-447 in that it does not refer to residential facilities. Instead, it appears to refer to private market housing. The proposed rule limits the funding of services under this chapter to residents comprising no more than 10% of the homes.

We find section 6100.447(b) to be very problematic because of the undue burden it places on the HCBS recipient. If a person receiving HCBS moves into an apartment, how will he or she know that other HCBS recipients live in the same building? In most cases the landlord does not have any reason to keep track of who is receiving such services. Will the caseworker or DHS have to do a review of all recipients to determine how many live in a particular building and what percentage of all residents they constitute? This seems overly burdensome.

If DHS does determine that there are already "enough" recipients living in a particular building, then where does the person go? The service recipient may have little or no choice of housing. There is a severe shortage of affordable homes in Pennsylvania. The Federal Reserve Bank of Philadelphia calculated a shortage of 272,000 rental homes statewide that are both affordable and available to households at approximately \$22,000 a year and below (30% of area median income). If a recipient is lucky enough to find an affordable home but the unit happens to be where other residents are also receiving services under this chapter, he or she may have to choose between having a home and receiving services.

While we understand and appreciate the Department's efforts to deconcentrate people with intellectual disabilities or autism and integrate these citizens into the community, we also understand the struggle to find and maintain a quality, affordable home. We, therefore, respectfully request that the 10% limit on the number of HCBS recipients in a development be increased or eliminated.

Thank you.

Sincerely,
Cynthia Witman Daley

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