July 20, 2020

Sheri Malnak  
Division of Housing and Community Resources  
Department of Community Affairs  
101 South Broad Street  
Post Office Box 806  
Trenton, New Jersey 08625-0806

Dear Ms. Malnak:

The Supportive Housing Association of New Jersey (SHA) is a statewide membership organization founded in 1998 and representing over 100 NJ organizations, mostly housing developers and supportive services providers all dedicated to creating permanent, affordable community housing with supportive services for people of low income with disabilities and other special needs. Robust development financing for capital as well as access to operating funding is critical to helping people with disabilities live in communities of their choice in homes they can afford.

SHA is grateful for the opportunity to provide input for future planning related to the housing and community development needs of the state. As noted in the plan, 10% of the population in the state has a disability. Furthermore, more than half of the disability population is over 62. The primary needs of this group are safe affordable housing and services that will allow them to maintain their health and live as independently as possible. Maximizing federal funding by leveraging state dollars is critical to helping the greatest number of people achieve these goals. This not only allows the best personal outcome but the best fiscal outcome for the state. At this time with so much uncertainty and the COVID pandemic impact still unclear, planning is critical to allow the focus to be as long-term as possible while still addressing immediate needs.

Following on the guidelines for input, we offer the following priority recommendations:

**Prioritize Supportive Housing for Special Populations**: Supportive Housing which pairs affordable housing with on-site supportive services is a proven strategy to decrease a variety of expensive health and system services, enhance stability and recovery and create independence for people with disabilities. SHA has found the following populations to be in the most critical need of housing: Elderly, Mentally ill, Substance abuse/addiction, and the developmentally disabled. Veteran and youth aging out of foster care housing are two additional populations that merit investment.
Invest in smaller rental unit construction and preserving affordable housing stock: Investing in new affordable housing construction while preserving the existing affordable housing stock should be a main goal of any planning. Specifically a majority of special needs populations would benefit from one or two bedroom apartments. Consideration should also be given to supporting project creation of smaller developments of under 25 units. At this times, municipalities in New Jersey are motivated to meet their affordable housing obligations. Not surprisingly projects of this density size are currently constrained by the ability to finance such projects. However, smaller projects are more attractive to municipalities looking at a variety of opportunities to fulfill this objective and may be able to leverage additional investment. Funding that would allow these smaller developments will encourage both increased opportunity for non-profit developers and a wider variety of affordable housing development tailored to specific needs.

Rental Assistance: It is critical to invest in rental assistance in the form of housing vouchers and to connect those vouchers wherever possible to opportunities for people special needs. Almost 1/3 of the households in the state live at or under 30% of AMI. At the same time many people with disabilities, as noted, rely solely on Supplemental Security Income to live. They are among the most severely cost burdened. Rental Assistance is therefore critical element in enabling them to live independently. Without this assistance the results are an overreliance on other costly institutional and health systems and unnecessary homelessness.

Accessibility improvements for people with a disability: As noted, the current NJ housing stock is old. People with physical disabilities find it especially difficult to find adequate affordable and accessible housing opportunities. At the same time those aging are precluded from remaining in their homes because of accessibility limitations. Investments in subsidizing home modifications that allow retrofitting existing homes would allow people to remain in their homes and encourage rental properties to adapt accessibility standards. Moreover, new units should be required and financially encouraged to abide by Universal Design standards.

Homeless Prevention and Rapid Rehousing: Wherever possible New Jersey should continue to work towards providing programs and services that move people from shelters to more permanent housing with services as quickly as possible. Shelters should be a door through which those seeking housing receive the assessment and referral they need to find a more stable solution. The shift towards housing first should continue to be a state priority.
SHA applauds the state’s creation of the new office of homelessness prevention. Using data to better address the needs of specific groups and offering a coordinated approach across departments will allow DCA to deliver a solution that provides the best care and at the same time is fiscally responsible. Additionally, the Access to Counsel and Homeless Diversion Pilot would be an important investment at this critical time of crisis when an ever growing number of people may face evictions.

We look forward to working with the DCA and other stakeholders to continue to provide safe affordable homes and increased opportunities for people with special needs to live in communities throughout New Jersey. Thank you for your consideration.

Sincerely,

Diane Riley
Executive Director