



State of South Carolina
Department of Mental Health

MENTAL HEALTH COMMISSION:

L. Gregory Pearce, Jr., Chair
Louise Haynes, Vice Chair
Allison Y. Evans, PsyD
Bob Hiott

2414 Bull Street • P.O. Box 485
Columbia, SC 29202

Kenneth M. Rogers, MD
State Director

November 10, 2020

SC State Housing Finance and Development Authority
Attention: Kim Wilbourne, LIHTC Manager
300-C Outlet Pointe Blvd.
Columbia, SC 29210

Dear Ms. Wilbourne:

Thank you for the opportunity to provide comments on the draft 2021 Qualified Allocation Plan (QAP).

As a housing advocate for persons with disabilities, specifically persons with serious and persistent mental illnesses, I am pleased that this QAP includes a new Supportive Housing scoring criterion. As background, the SC Department of Mental Health (SCDMH) executed an *Olmstead* Settlement Agreement with the SC Protection and Advocacy for People with Disabilities, Inc. in 2019 that included an obligation "to increase Community Housing by 30 to 40 beds per year via the development of supported housing for a period of five years." SCDMH committed state funds for this purpose. Here are recommendations related to two sections of the draft QAP that relate to SCDMH's ability to fulfill this obligation.

Section V, Threshold Participation Criteria, A.1.

Developers are required to submit a statement that they will not give a preference based on disability type or being a client of a particular service provider without Authority approval. Given that SCDMH has committed state funds to expand permanent supportive housing for its patients in accordance with the *Olmstead* Settlement Agreement, SCDMH requests Authority approval to allow developers to partner with SCDMH to assist in fulfilling the Agreement.

Section VI, New Construction Scoring Criteria, G. Leveraging

It is recommended that documented support from a non-SC Housing state government agency be added as a leveraged funding source to qualify for the additional points.

MISSION STATEMENT

To support the recovery of people with mental illnesses.





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Section VI, New Construction Scoring Criteria, I. Supportive Housing

SCDMH supports this new scoring criterion. Targeting 10% of the total units to persons with disabilities and designating such units as affordable to and occupied by 20% AMI (or securing a commitment of federal project-based rent assistance, if available) ensures that the rents are affordable for persons with disabilities who receive Supplemental Security Income (SSI) as their primary source of income. It is recommended that in order to receive the points, developers should be required to submit an executed Memorandum of Understanding (MOU) with one or more state or local government-funded human service agency(ies) that provide services for disability populations in the geographic area where the project is located. The MOU should clearly indicate the number of units targeted, identify the array of supportive services to be made available to tenants, and outline the roles and responsibilities of each partner to ensure successful implementation. The MOU should also include the developer's commitment to establish a preferential leasing opportunity for referrals and maintain a separate waiting list for the Supportive Housing units.

Please contact me if there are questions.

Sincerely,

A handwritten signature in black ink that reads "Michele Murff". The signature is written in a cursive, flowing style.

Michele Murff
Director, Housing and Homeless Programs

cc: Elizabeth Hutto, General Counsel

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