



Department of  
Job and Family Services

Ted Strickland, Governor  
Douglas E. Lumpkin, Director

July 13, 2009

Ms. Phyllis Smelkinson  
U.S Department of Housing and Urban Development  
Office of Public and Indian Housing  
Housing Voucher Management and Operations Division  
451 7<sup>th</sup> Street, SW., Room 4210  
Washington, DC 20410

Dear Ms. Smelkinson:

The Ohio Department of Job and Family Services (ODJFS) thanks the U.S Department of Housing and Urban Development (HUD) for the opportunity to submit comments on Docket No. FR-5332-N-01 and the commitment to assist state agencies in the implementation of the Money Follows the Person Demonstration Program (known in Ohio as “HOME Choice”).

As the State Medicaid Agency in Ohio, we wish to submit comments on this Notice of Funding Availability (NOFA). The primary barrier HOME Choice participants face is the ability to obtain affordable and accessible housing in the community. Many participants are on a low-fixed income and cannot afford to pay market rates for an apartment. Additional vouchers will assist us in ensuring safe, affordable and accessible housing in Ohio. However, we suspect that 1,000 vouchers nationally may not be enough to meet the national MFP housing need. Initial MFP project proposals across the 30 participating states reveal that as many as 38,000 participants are expected to transition into community settings. Due to this volume, we encourage HUD to raise the number of Category 2 vouchers for MFP by allowing unobligated funds under HUD’s FY2008 NOFAs to be made available under Category 2 instead of Category 1.

Each Public Housing Authority (PHA) has local discretion making it difficult to work strategically to address the housing needs of Ohioans who have disabilities. Many PHAs have not allocated vouchers for non-elderly persons with disabilities and/or persons residing in nursing homes or other institutions within their administrative plans. PHAs are interested in partnership, but question how to accommodate MFP within the various local structures. We recommend HUD to broaden qualified applicants to include State Housing Finance Agencies and State Community Development Agencies. Doing so will allow vouchers to be connected to

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HOME Choice consumers in areas where the PHA has chosen to not apply for these vouchers. We further recommend that HUD provide technical assistance to PHAs to alleviate the questions that may prevent the PHAs from participating in such an important demonstration.

We are concerned that the proposed NOFA section on “PHA experience” is so restrictive that it will impede PHA applications. We have a successful partnership with the Cuyahoga (County) Metropolitan Housing Authority, and it is willing to apply for the new, additional vouchers. However, we may have difficulty convincing small PHAs who may not meet the threshold requirement for “PHA experience” to apply for Category 2 vouchers. We suggest that HUD modify the experience section of the NOFA to prevent the unintended consequence of discouraging otherwise capable PHAs interested in MFP collaboration and/or accept applications from PHAs without the required experience if the PHA can demonstrate a partnership with the MFP demonstration project.

Beyond the applicability of the NOFA, we request greater HUD attention to the tracking and monitoring of vouchers for persons with disabilities. There is no process in Ohio, or nationally, to verify the use of vouchers designated specifically for persons with disabilities (Mainstream Vouchers). We know through anecdotal and advocacy experience, that vouchers dedicated to persons with disabilities are not always used appropriately especially during re-allocation. PHA accountability is limited and no consistent means exists to verify that the voucher went to the next person on the waiting list that had a disability or into the main pool of vouchers for the PHA. In order to hold PHAs accountable for these vouchers, we recommend that HUD create a tracking and monitoring system to verify the designated vouchers and ensure their use for persons with disabilities. We believe that doing so will further advance the movement to ensure choice and independence for all persons with disabilities consistent with the Olmstead decision and the President’s “The Year of Community Living” effort.

We thank you for the leadership necessary to move the President’s effort forward and look forward to continued partnership with HUD on MFP as well as other critical housing initiatives. We believe this is a great opportunity for us to provide leadership and build partnerships with PHAs working together to serve Ohioans with disabilities.

If you wish to discuss these suggestions, please contact ODJFS Housing Coordinator Brock Robertson at 614-466-6742.

Sincerely,

John Corlett  
Medicaid Director

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