



# HOUSING FOR DEVELOPMENTALLY DISABLED CITIZENS

AN ANALYSIS OF POLICY ISSUES

NATIONAL ASSOCIATION OF STATE MENTAL RETARDATION PROGRAM DIRECTORS, INC.

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An Analysis of Policy Issues

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## FOREWORD

This report has been prepared as part of a two year technical assistance project awarded to NASMRPD by the Developmental Disabilities Office, Office of Human Development Services, Department of Health, Education, and Welfare (OHD Grant Number 54-P-71156/ 3-02). One of the project's major objectives is to demonstrate the manner in which consumer, provider and professional interest groups can work cooperatively to alleviate barriers to the effective utilization of federal generic assistance programs on behalf of one of society's most vulnerable groups—developmentally disabled citizens. Thus, every effort has been exerted to involve representatives of key national organizations in the identification of relevant issues and the formulation of recommendations. An eight member Project Advisory Board has been the main vehicle for achieving consensus among the group (see membership roster, p. v).

This approach has precipitated the organizations' formal endorsements of the recommendations contained in the report (see p.iii). Such collaboration represents a major step toward presenting a unified position on the housing needs of developmentally disabled persons. The reader should realize, however, that responsibility for the accuracy of the reported data and the interpretation which is given to the findings rest solely with the project staff.

During the past ten years, the impetus for a major thrust in community housing for developmentally disabled persons has come from voluntary non-profit organizations. These groups have either provided the service directly or been successful in lobbying state legislatures to mandate action by the public sector. While the federal government has assisted state and local communities to provide a wide range of daytime habilitative service for developmentally disabled individuals, until recently, little federal aid has been available to groups interested in establishing and operating community-based housing.

This lack of federal involvement has gradually begun to change since Congress enacted legislation in 1974 to permit the development of housing for handicapped citizens until several programs administered by the U.S. Department of Housing and Urban Development. The following pages document some of the exciting new possibilities which have become available over the past few years to advocates of community housing for handicapped persons. However, it also identifies continuing barriers to utilizing federal housing assistance programs and recommends a variety of actions to eliminate these impediments.

It is our fervent hope that this report will assist both federal policymakers and interested professionals and laymen to understand the impact of federal housing programs on developmentally disabled citizens and move to expand the possibilities already available.

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## SUMMARY OF RECOMMENDATIONS

### 1. RENT SUBSIDIES (Chapter III)

- Throughout the Section 8 program, HUD should address the non-elderly handicapped as a separate, identifiable population. This distinction should be reflected in all Departmental rules, handbooks, policy and procedural instructions, contracts, data collection and application forms, and reports concerning the Section 8 program, (p. 21)
- HUD should issue personnel and procedural instructions specifying the duties of the Elderly/Handicapped Coordinator, stipulating that the coordinator's role is a full-time position, and describing the coordinator's specific responsibilities within the HUD Section 8 program, (p. 23)
- An intensive training program should be launched to familiarize HUD personnel with the various types of handicapping conditions, the specific housing and programmatic (supportive service) needs of distinctive sub-groups within the handicapped population, and the applicability of HUD's programs in meeting these needs. This training effort should be jointly developed and sponsored by HUD and HEW. (p. 24)
- HUD should make provision for rental agents in PHA's who are specially trained and equipped to assist individuals with developmental disabilities to exercise their housing options or subsidize selected human service agencies, so they can add such trained personnel to their staff, (p. 25)
- Beginning in FY 1979 HUD should require PHA's to target a portion of their outreach and client services specifically toward persons with handicapping conditions, (p. 25-26)
- Beginning in FY 1979 HUD should require PHA's to promote the rental of housing units to handicapped persons, (p. 26)
- HUD should eliminate the Rent Reasonableness Determination requirement for all new construction/substantial rehabilitation projects for handicapped individuals and base rents on factors of cost. (p. 27)
- Fair Market Rents for units housing handicapped individuals should be established in a manner which will insure their economic feasibility. As an interim step in this direction, the Secretary of Housing and Urban Development should revise the current Fair Market Rent structure to base FMR's for each handicapped individual residing in a group living arrangement on a percent of the Fair Market Rent for an efficiency apartment unit. This percentage should be so established that sufficient funds are available to the sponsor to cover all shelter, maintenance and unit management costs. It is especially important that this policy be reflected in the Department's final regulations on Independent Group Residences.

Meanwhile, the Secretary of Housing and Urban Development should establish a study group to investigate alternative approaches to setting rent subsidy levels, including more equitable methods of assuring that the full continuum of living environments needed by persons with various types and degrees of handicapping conditions are available, (p. 29)

- The Department of Housing and Urban Development should implement, in conjunction with the Department of Health, Education and Welfare, a cross program analysis of the interaction between housing and income maintenance programs and the specific impact of various policies on persons eligible for benefits under both programs, (p. 29)
- HUD should modify its regulations to allow a sufficient time period (i.e., 60 days) during which a vacancy in an independent group residence can be filled without financial penalty or moving requirements being imposed on the remaining residents. In addition, PHA's should be offered incentives to reserve a revolving pool of Section 8

certificates for non-elderly handicapped persons so newly eligible residents can be assured rental assistance in housing projects designed for such persons, (p. 29)

- HUD's Lower Income Housing Assistance program should be continued, expanded and modified to meet the housing needs of handicapped persons. More specifically, Section 8 subsidies should be increased and a portion of each state's allotment should be earmarked for the construction, renovation and acquisition of housing for the non-elderly handicapped individuals, (p. 32)

## II. HOUSING LOANS (Chapter IV)

- The special FY 1979 set-aside for non-elderly handicapped projects, contained in recently enacted Congressional legislation, should be retained in subsequent fiscal years and the amount increased in accordance with escalating demand for such assistance, (p. 41)
- Congress should review carefully the advantages and disadvantages of establishing a separate direct loan program to encourage the development of housing for non-elderly handicapped persons, (p. 44)
- HUD should modify its current criteria for funding Section 202 projects to make it clear that a variety of types of community-based housing for the developmentally disabled, in addition to group homes, can be supported through the Elderly/Handicapped Direct Loan program, provided the existing size and dispersal criteria are followed, (p. 46)
- HUD should establish criteria for approving substantial rehabilitation projects under Section 202 which will encourage potential sponsors to acquire structurally sound, single family homes in desirable neighborhoods and convert them to group homes for developmentally disabled individuals, (p. 47)
- A joint HUD-HEW task force should be appointed to determine the most appropriate and feasible method(s) for assuring that both capital construction and ongoing operating funds are available to potential sponsors of community residential facilities serving developmentally disabled persons, (p. 48)
- HUD should re-examine the question of who may sponsor 202 loan projects and determine if the existing restrictions on public and limited dividend sponsors should be lifted (and if so, under what circumstances) in light of the Nation's current and projected goals for meeting the housing needs of developmentally disabled individuals, (p. 48)
- HUD should modify its current consultant criteria and fee scale in order to enable applicants to obtain a housing consultant when needed, (p. 49)
- An ongoing HUD-HEW task force should be established (and expanded, as necessary, to include representation from other appropriate federal agencies) to facilitate improved working relations between housing agencies/sponsors and agencies serving handicapped persons at the state and local levels, (p. 50)
- HUD should require each sponsor of a 202-financed housing project for developmentally disabled persons to sign a statement assuring that each resident requires the type of housing provided by the project and is enrolled in a daytime program appropriate to his or her needs, as specified in his/her individualized habilitation plan, (p. 50)
- The Secretary of Housing and Urban Development should commission a broad ranging study of ways in which HUD field offices can provide improved technical assistance to applicants and sponsors of 202 housing projects. (p. 51)
- HUD should implement the provisions of Section 210(c) of P.L. 93-383 by requesting comments from the appropriate state mental retardation/developmental disabilities agency and the state DD planning council on each Section 202 loan application which involves a housing project designed exclusively or primarily to serve developmentally disabled persons, (p. 54)

### III. COMMUNITY DEVELOPMENT BLOCK GRANTS (Chapter V)

- HUD should develop a plan which incorporates alternative methods of public notification concerning the availability of Title I funds and encourage localities to implement a variety of such methods, (p. 62)
- HUD management information systems should be modified to provide relevant information concerning the use of CDBG funds on behalf of handicapped persons, (p. 64)
- For reporting purposes, HUD should separate elderly and non-elderly handicapped activities funded in whole or part with federal CDBG funds. All current references to "elderly and handicapped" in HUD manuals and reporting forms should be changed to reflect two distinct populations, (p. 65)
- The HAP reporting format should place elderly and non-elderly handicapped groups into two separate categories, (p. 65)
- HUD should develop clear guidelines for identifying the housing needs of handicapped persons to support the required narrative statement of needs in the local Housing Assistance Plan. These guidelines should include:
  - (a) alternative methods for involving handicapped persons and advocacy groups;
  - (b) techniques for maintaining a census of existing units for handicapped persons;
  - (c) methods for projecting the short and long term demand for such housing (e.g., as a function of deinstitutionalization efforts within the state or region); and
  - (d) an identification of critical variables influencing the location of housing for handicapped persons, such as access to services and transportation.

Given the complexity of the issues which must be considered, HUD should award a grant or contract under Section 107(a)(4) of the Housing and Community Development Act of 1974 or Section 507 of the Housing and Urban Development Act of 1970 to support the development of such guidelines, (p. 66)

- HUD should develop guidelines for housing needs surveys for the handicapped population utilizing CDBG funds, Section 701 planning grants, and other available sources in order to support proposed HAP revisions. Such surveys should encompass all handicapping conditions and actively involve local provider agencies and advocacy organizations, (p. 67)
- HUD should require that applicants for CDBG funds develop an open housing action plan as part of their Housing Assistance Plan and report regularly on steps which have been taken to implement the plan. Such an open housing plan should require the revision of local zoning ordinances to accommodate a variety of alternative community living arrangements for the developmentally disabled and other handicapped groups, (p. 67)

### IV. RURAL HOUSING (Chapter VI)

- To insure that national, state and county staff are responsive to the housing needs of handicapped people living in rural areas, the Administrator of the Farmers Home Administration should establish a "Desk for the Handicapped" in the central office and have well-trained staff, familiar with the housing needs of handicapped persons at the state, and ultimately, the county levels, (p. 79)
- HUD and USDA should establish goals for the development of housing for the handicapped in rural areas and commit substantial resources toward meeting those goals, (p. 82)
- Congress should amend P.L. 95-128 to correct the inadvertent omission of "autism" from the definition of a developmental disability and, in other respects, make the definition of the term contained in the Housing and Community Development Act of 1977 conform to the provisions of the Developmental Disabilities Services and Facilities Construction Act, as amended, (p. 83)
- The proposed "Desk for the Handicapped" (see Recommendation on p. 79) should communicate with relevant consumer and provider organizations as an initial step toward the development of an agency-wide plan for serving the handicapped, (p. 85)

- The Farmers Home Administration should make private foreclosed properties more readily available to sponsors of handicapped housing. Care should be exercised in the selection of such properties, however, to assure that the handicapped residents receive an appropriate living environment which is accessible to the services and recreation/social opportunities they require, (p. 86)
- The Farmers Home Administration should, as a matter of policy, permit the use of Section 504 rural rental loans for making housing accessible and usable by handicapped persons, (p. 87)
- Congress should extend eligibility for Section 504 grants to handicapped persons, (p. 87)
- The Farmers Home Administration should liberalize its policy on assured income to recognize as reliable sources of support the following general categories of household income (assuming there is no contravening evidence of instability): annual renewable contracts with public funding sources, ongoing public and private grants, tenant earnings and income transfer programs such as Social Security, Supplemental Security Income (SSI), veterans and railroad retirement benefits, (p. 89)
- USDA and HUD should cooperate to insure parity between their respective rental assistance programs, eligibility criteria and administration, with special attention to the unique needs of the handicapped person, (p. 91)
- The Farmers Home Administration should conduct a survey of projects for handicapped persons funded under the Rural Development Loan program, and use the results to train its national, state and county staff on effective use of this program to benefit disabled persons living in rural areas. In addition, information about handicapped projects should be made an integral part of FmHA's ongoing reporting system so realistic national goals and priorities can be established and monitored, (p. 92)

## V. THE ROLE OF STATE AND LOCAL HOUSING AGENCIES (Chapter VII)

*A variety of alternative approaches are available to states and localities interested in mounting a specialized housing program for developmentally disabled persons, including: (a) state level use of Section 8 existing housing; (b) state level use of new construction and/ or substantial rehabilitation projects; (c) local use of Section 8 existing housing; (d) locally initiated new construction/ substantial rehabilitation projects; (e) public housing projects; and (f) Community Development Block Grant funds.*

*States which elect to use Section 8 existing housing should observe the following guidelines (p. '109-110):*

- Local mental retardation/developmental disabilities and other human service agencies should be designated for purposes of outreach, identification of eligible individuals, and provision of support services.
- Use of existing living arrangements should be tied to the provision of self-help, vocational, and other skills training in order to ensure that clients are successful in independent and semi-independent living arrangements.
- Where feasible, LHA's should be used as the distribution point for certificates for developmentally disabled persons since local housing authority personnel are most familiar with local circumstances, housing patterns and landlords.
- The state housing agency, in conjunction with local housing agencies, should conduct a statewide survey to identify existing housing that is accessible to physically handicapped individuals. Where such housing exists, but is above the local Fair Market Rent, the state should explore the various FMR waiver provisions that can be utilized to secure increases.
- If possible, all other options available through the state housing agency and its allocation of Section 8 should be explored before developing an existing Section 8 program within the mental retardation/developmental disabilities agency.

- If the state housing agency is unwilling or unable to develop an existing Section 8 program for developmentally disabled persons, the state should request that the housing agency sub-allocate a portion of its certificates to the state mental retardation/developmental disabilities authority for distribution.
- If the state housing agency does not want to participate in any type of partnership with the State mental retardation/developmental disabilities agency, the state should ask HUD to designate the developmental disability authority as a public housing agency for purposes of receiving a specific allocation of existing Section 8 contract authority.
- A thorough investigation of all possible changes that would be necessary before the state mental retardation/developmental disabilities authority could be designated as a public housing agency (e.g., changes in state laws, administrative regulations, etc.) should be completed prior to submission of the request.
- HUD should fund the state mental retardation/developmental disabilities authority on a pilot basis in order to test the feasibility of such an approach.
- A specific plan or strategy should accompany the request for designation including the number of units to be distributed, the type of clients who would benefit from the Section 8 subsidies, the kinds of residential arrangements the subsidies would be used for and the location of the planned residences.
- Unless there is available housing expertise within the state mental retardation/developmental disabilities agency, a liaison should be established with HUD, including the possible assignment of a HUD staff person, through the Intergovernmental Personnel Act, to help design and administer the Section 8 program for the State (as is the case, for example, in Colorado).
- In designing an overall management and operating plan for the Section 8 program, consideration should be given to the way in which certificates will be distributed—i.e., should the state administer the program directly or allocate certificates through local mental retardation/developmental disability planning units or through local housing authorities.

*States which choose to initiate new construction/substantial rehabilitation programs for developmentally disabled citizens should observe the following guidelines (p. 125-126):*

- If possible, three financing mechanisms for sponsors developing community based housing for handicapped persons should be available, including seed money, interim construction and permanent long term financing.
- Appropriate standards for the new construction program, which are based on the principles of normalization and integration of handicapped persons into the community should be developed. These standards should include specific criteria for site selection, architectural design and other relevant requirements.
- Housing finance agencies, in cooperation with HUD and/or other state agencies, should consider financing a demonstration or pilot project which would involve a variety of residential models that could be designed for handicapped persons.
- Adequate monitoring mechanisms at each stage of the housing development process should be incorporated in order to ensure eventual compliance with all appropriate federal, state and local building and fire safety codes.
- The possible combination of housing finance agency capabilities with other federal and/or state programs, including Title XIX, Farmer's Home Administration, and Section 231, should be explored.
- Prototypical architectural plans for various size congregate living arrangements should be developed and made available to local sponsors for a nominal fee.
- Technical assistance materials should be prepared including a "how to" manual for potential sponsors that

details each facet of the building process (e.g., financing, site selection, design elements and types of support services). Responsibilities of both the sponsor and the housing agency in meeting the requirements of the program should also be clearly delineated.

- Prototypical budgets should be prepared in order to determine the optimal size of the housing project *to* be built; such budgets should be based on a normal, home-like setting for the particular disabled individuals to be served.
  - Specific criteria for the selection of potential community sponsors should be spelled out, emphasizing the agency's ties and experience with other local agencies in the provision of residential and/or support services to developmentally disabled persons.
  - Where possible, the new construction program for developmentally disabled persons should be integrated with other generic and/or specialized housing programs available at the state and local levels.
- <sup>c</sup> HFA administered new construction programs for developmentally disabled persons in other states should be examined and, if possible, site visits to such states should be arranged.
- Housing finance agencies should provide technical assistance to sponsors in such areas as: assembling members of the project development team; reviewing and obtaining site control; and processing the various loans and subsidies for the project(s).
  - An overall management and operational plan for the statewide housing construction program for developmentally disabled persons should be developed.
  - if feasible, increases of up to 126 percent of the Fair Market Rent for new construction/substantial rehabilitation should be obtained in order to provide sufficient subsidy to make small home-like facilities economically viable.
  - Some local review mechanism should be developed to ensure that construction proposals are consistent with local needs and the availability of necessary support services.
  - Since most of the ICF/MR facilities constructed using Title XIX will have to receive a "certificate of need" from the State Health Coordinating Council, materials should be prepared by the state/local mental retardation/developmental disabilities agency explaining the justification for ICF/MR facilities, the types of clients to be served and the functions of the planned facility. Materials should be distributed to housing finance agencies serving the area and State Health Coordinating Council members.
  - A certain degree of flexibility should be built into the development of ICF/MR's to ensure that projects are not ultimately defeated or slowed down by overly rigid adherence to specifications not directly relevant to ultimate Title XIX certification.
  - The state mental retardation/developmental disabilities agency should explore alternative funding sources for housing development (SSI, Title XX, etc.) in order to avoid over-reliance on Title XIX funding.
  - In cases where new construction of ICF/MR's is funded by commercial sources, housing proposals should be screened by the state mental retardation/developmental disabilities agency and the state Medicaid agency prior to submission to a private lender so that the agency can assure the provider that Title XIX funding is potentially available upon completion of the facility(s). The mental retardation/developmental disabilities agency should also encourage providers to develop multiple facilities (within some limitation) in order to ensure the receptivity of commercial lenders.

*Individuals and groups seeking Section 8 existing housing certificates through local housing agencies should observe the following guidelines (pp. 131-132):*

- In areas where it is difficult to secure adequate and/or accessible housing for developmentally disabled persons within the Fair Market Rent structure, local housing authorities should explore the possibility of applying to HUD for higher FMR's under the provisions of Section 882.120. This section enables public housing agencies to request authority from HUD to use higher rates in "recently constructed" housing when:

" . . . the housing needs of one or more particular household types (e.g., elderly/handicapped family, large family) cannot be addressed utilizing the supply of Existing Housing at or below the rent authorized under §882.106 because of lack of availability of appropriate units."

- LHA's, in cooperation with State housing agencies, should prepare and distribute educational brochures to potential landlords describing the virtues of the Section 8 program and the affirmative reasons for renting to handicapped individuals.
- LHA's use of Section 8 in existing housing for developmentally disabled persons should be conducted in conjunction with responsible local human and health service agencies in order to ensure the availability of support services.
- Where feasible, LHA's should designate specific staff to be responsible for assisting developmentally disabled persons to apply for Section 8 certificates and to secure appropriate housing.

*Individuals and agencies interested in instituting locally financed or sponsored new construction/substantial rehabilitation projects should observe the following guidelines (p. 134):*

- If necessary, local housing authorities should amend their enabling legislation to include the possibility of financing new construction or substantial rehabilitation projects for developmentally disabled persons.
- LHA's should explore the feasibility of financing projects under Section 11(b) of the Housing and Community Development Act of 1974 to generate developments that can either directly or indirectly benefit handicapped individuals.
- Where possible, new construction or substantial rehabilitation projects sponsored and/or financed by the LHA should incorporate the principles of normalization and avoid the development of large, segregated high-rise facilities which serve only disabled residents.
- If a local housing authority has financed or is considering the development of new construction or rehabilitation projects for the elderly or other low and moderate income groups, the percentage of units that are designed to be barrier-free should be reserved for physically handicapped persons, including both the elderly with severe mobility limitations and non-elderly physically handicapped persons.
- If the allocation of Section 8 subsidies for new construction/substantial rehabilitation is insufficient to produce new or rehabilitated housing for disabled persons, a LHA should consider requesting from HUD or from the state housing finance agency additional units (i.e., if the HFA can, in fact, sub-allocate unused Section 8 new construction/substantial rehabilitation subsidies to the local housing authority), specifically earmarked for handicapped clients.

*Agencies and advocates interested in accessing public housing for developmentally disabled persons should observe the following guidelines (p. 136):*

- Local housing authorities should explore the availability of modernization money for use in retrofitting existing public housing projects so they are accessible to and usable by physically handicapped individuals.
- In planning for new housing projects, LHA's should canvass the needs of handicapped individuals in the community to assure that at least some of the planned units are built and located in ways that guarantee maximum use by this target group.

- Local housing authorities should explore alternative uses of public housing units for non-residential purposes such as day activity programs, vocational training and so forth.
- LHA's should explore the use of federal public housing support for the construction of individual family units that can be made available to developmentally disabled persons for group living arrangements.
- Local housing authorities should explore the possibility of sub-leasing all or portions of public housing facilities for use by non-profit sponsors of residential and daytime habilitative services for developmentally disabled persons.

*Individuals or groups seeking local Community Development Block Grant funds should observe the following guidelines (p. 139):*

- Local mental retardation/developmental disabilities agencies should be encouraged to work with umbrella organizations such as community development coalitions in order to reduce duplication of requests and investments of staff time in the community development planning process.
- Adequate information and technical assistance should be provided by the local housing authority to agencies that have been awarded community development funds.
- Before an LHA makes a Community Development Block Grant award to a local agency serving developmentally disabled persons, a review and analysis of the particular project should be conducted in order to determine that the integration of handicapped citizens into community life is being reinforced instead of thwarted as a result of the planned activity.
- Specific information on deinstitutionalization efforts affecting the local area should be provided by either the local or state mental retardation/developmental disabilities agency and included in the community's HAP.

*Regardless of whether they elect to use Section 8 existing housing, new construction/substantial rehabilitation projects or public housing, local housing authorities should observe the following general guidelines (p. 139):*

- LHA staff should develop formal and informal interagency relationships with local public and private developmental disabilities (and other human services) agencies to assure appropriate referrals and the provision of support services for Section 8 certificate holders and other developmentally disabled persons who may be residents of LHA-controlled and financed facilities.
- Local housing authorities should seek housing counseling center funds from HUD for purposes of establishing a unit within the agency to work directly with developmentally disabled clients and their families.
- Units within existing LHA-managed housing units, as well as in any newly constructed housing sponsored by the local housing authority, should be held in reserve for developmentally disabled persons.
- LHA's should explore ways in which they can directly finance the development of new projects designed either exclusively or in part for developmentally disabled individuals.

## VI. DISCRIMINATION AS A BARRIER TO HOUSING (Chapter VIII)

- The federal government should use its leverage to encourage all states to enact and enforce statutes which will permit the establishment of small, community residences and other home-like living opportunities for developmentally disabled persons in appropriate residential neighborhoods by: (a) providing technical assistance to develop and implement such statutes; (b) supporting pending Congressional legislation that would include the handicapped as a protected class and increase federal enforcement authority under the Fair Housing Act; (c) by taking an aggressive role in carrying out the Act's mandate; and (d) requiring Housing Assistance

Plans under the Community Development Block Grant program to include an assessment of local zoning practices, (p. 145)

- Congress should enact legislation that will: (1) provide broad protection for handicapped persons under Title VIII of the Civil Rights Act of 1968; (2) grant greater enforcement power under the Act to HUD and other federal agencies; and, (3) prevent local authorities from enacting zoning ordinances intended to exclude handicapped persons, (p. 148)
- HUD should expand the goals of the existing areawide Housing Opportunity Planning program to include the provision of increased and dispersed community housing for developmentally disabled and other handicapped individuals, (pp. 149-150)
- No waivers or exemptions should be allowed for newly constructed facilities under HUD's Section 504 regulations, (p. 150)
- HUD should narrow its definition of the term "small provider" so that it will apply only to those programs which would have to sustain an undue hardship to comply with the rules, (p. 151)
- HUD should review and modify reporting requirements associated with Section 504 compliance in order to simplify and substantially reduce the amount of paperwork which Section 8 landlords must complete to participate in the rent subsidy program, (p. 151)
- The general waiver of site selection accessibility requirements should be eliminated from HUD's final Section 504 regulations, (p. 152)
- The Federal Insurance Administration should develop a national strategy to combat discriminatory insurance practices and increase public awareness of insurance issues, especially among sponsors of group homes and other community residences for developmentally disabled persons, (p. 153)

## VII. HOUSING STANDARDS AND CODES (Chapter IX)

- Using the findings and conclusions of the National Bureau of Standards' study, HEW and HUD should adopt common policies for determining the life safety provisions to be applied in various types of community housing for developmentally disabled persons, (p. 161)
- The Syracuse revision of the ANSI 117.1 Standard on accessibility should be modified to include special design considerations related to mentally and neurologically handicapped persons, as well as the physically disabled, (p. 163)
- Congress and the Carter Administration should move expeditiously to strengthen the enforcement capabilities of the Architectural and Transportation Barriers Compliance Board, (p. 165)
- A&TBCB should give increased attention to the removal of environmental barriers to participation/utilization by disabled individuals who are ambulatory but, nonetheless, require specific adaptations in their physical environment, (p. 165)
- The Department of Housing and Urban Development should move with all deliberate speed to strengthen the accessibility requirements contained in the Minimum Property Standards. In those instances where the draft revisions to the ANSI A 117.1 Standard are imprecise or incomplete, steps should be taken immediately to initiate further research and development activities under Section 507 of the Housing and Urban Development Act of 1970, as amended, (p. 165)
- Based on a careful analysis of the findings and recommendations of its Task Force on Housing Costs, HUD, in collaboration with other interested federal agencies, should move expeditiously to curb the inflationary

costs of constructing federally assisted housing and encourage new and innovative building techniques throughout the housing industry, including techniques which will minimize costs without sacrificing quality and diversity in living environments for handicapped Americans, (p. 167)

HUD should earmark a portion of the so-called moderate rehabilitation funds, authorized under the Housing and Urban Development Amendments of 1978, for assisting local communities to make a portion of Section 8 existing units accessible to and usable by physically handicapped persons, (p. 168)